



IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
NORTHERN DIVISION

- - -

IN THE MATTER OF THE : CIVIL NO.
PETITION OF : 24-00941-JKB
:
GRACE OCEAN PRIVATE : IN ADMIRALTY
LIMITED, as Owner of :
the M/V DALI and : REDACTED DOCUMENT
SYNERGY MARINE PTE :
LTD, as Manager of the :
M/V DALI, :
:
For Exoneration from :
or Limitation of :
Liability :

HIGHLY CONFIDENTIAL

- - -

February 18, 2025

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Videotaped deposition of
KARTHIKEYAN DEENADAYALAN, taken pursuant
to notice, was held at the Baltimore
Marriott Waterfront, 700 Aliceanna
Street, Baltimore, Maryland, beginning at
10:01 a.m., on the above date, before
Michelle L. Ridgway, a Registered
Professional Reporter, Certified
Shorthand Reporter, Certified Realtime
Reporter, and Notary Public.

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I N D E X

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Testimony of:

KARTHIKEYAN DEENADAYALAN

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DEPOSITION SUPPORT INDEX

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None.					

Questions Marked

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None.					

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2 THE VIDEOGRAPHER: We are
3 now on the record.

4 My name is Jason Levin.
5 I'm the videographer retained by
6 Lexitas.

7 Today's date is
8 February 18, 2025, and the time
9 is 10:01 a.m. Eastern.

10 This deposition is being
11 held at the Baltimore Marriott
12 Waterfront, in the matter of In
13 re Grace Ocean Private Limited
14 Litigation.

15 The deponent is
16 Karthikeyan Deenadayalan.

17 All counsel will be noted
18 on the stenographic record.

19 The court reporter is
20 Michelle Ridgway, and she will
21 swear in the witness.

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... KARTHIKEYAN DEENADAYALAN,

having been first duly sworn, was

examined and testified as follows:

- - -

EXAMINATION

- - -

BY MR. JARRETT:

Q. Good morning, Chief

Engineer Deenadayalan. Is that correct?

A. That's correct.

Q. So I'm going to have you

state your name for the record, please,

and would you please spell it for the

court reporter.

A. K-A-R-T-H-I-K-E-Y-A-N,

D-E-E-N-A-D-A-Y-A-L-A-N.

Q. Thank you -- thank you,

Chief.

Before the deposition I

mentioned to you that I would be calling

1 you "Chief" today because it's easier
2 for me than your name, which is
3 difficult for me. Is that okay with
4 you?

5 A. Yes, sir.

6 Q. I don't mean any disrespect
7 by that, please.

8 A. Yes, sir.

9 Q. So have you given a
10 deposition before?

11 A. No.

12 Q. All right. I'm sure you've
13 been advised about what the process is
14 like, but I will ask you a series of
15 questions today, you'll give me your
16 answers.

17 Do you understand that
18 you're under oath today, just as if you
19 were in front of a judge and a jury?

20 A. Yes, sir.

21 Q. And could you -- if you --

1 need to state your answers out loud.

2 You understand that?

3 A. Yes, sir.

4 Q. And if I state a question
5 that you do not understand, please ask
6 me to rephrase it. Will you do that?

7 A. Yes, sir.

8 Q. Okay. Can you tell me how
9 old you are, Chief?

10 A. I'm 44 now.

11 Q. 44?

12 A. Yeah.

13 Q. At the time --

14 MR. BERNSTEIN: Keith,
15 could we perhaps put the stip --

16 MR. JARRETT: Oh, of
17 course. We just talked about
18 that, and I forgot it already.

19 MR. BERNSTEIN: Oh, no.

20 It's not a problem. No problem
21 at all.

1 MR. JARRETT: As a
2 reminder to those who are
3 listening in, this deposition is
4 being deemed confidential by
5 Mr. Bernstein and the witness,
6 and people should treat it in
7 accordance with the
8 confidentiality order that has
9 been entered by Judge Bredar. I
10 think Mr. Bernstein would like
11 to make a statement about that.

12 MR. BERNSTEIN: I would.
13 Gregg Bernstein, on behalf
14 of the deponent, along with my
15 partner John Connolly.

16 We believe that the second
17 amended protective order signed
18 by Judge Bredar on February 3rd
19 of this year, that's ECF
20 Number 474, applies to this
21 deposition.

1 The deponent,
2 Mr. Deenadayalan, is a
3 designated party as that term is
4 defined in Paragraph 1J. And as
5 a designated party, we are
6 designating the deposition and
7 its contents as confidential
8 pursuant to Paragraph 5 of the
9 protective order.

10 And so, therefore,
11 pursuant to Paragraph 3 of the
12 protective order, this
13 deposition and its contents may
14 only be used for the purpose of
15 this action and may not be
16 disclosed -- disclosure is
17 defined in Paragraph 1G of the
18 protective order -- may not be
19 disclosed to anyone other than
20 those individuals identified in
21 Paragraph 4 of the protective

1 order.

2 The provisions of the
3 protective order apply not only
4 to those individuals personally
5 attending this deposition but
6 also to anyone who has access to
7 the link to the deposition and
8 may be observing or listening.

9 Only individuals described
10 in Paragraph 4 of the protective
11 order are permitted to listen to
12 this deposition, and, as you
13 guys did yesterday, we would
14 finally ask that anyone who may
15 be listening on the link to send
16 an e-mail to Mr. Reisman, or
17 Keith, to you, and to
18 Mr. Bennett on behalf of
19 Synergy, indicating that they
20 are participating and
21 acknowledge.

1 MR. JARRETT: Thank you,

2 Mr. Bernstein. So noted.

3 BY MR. JARRETT:

4 Q. Chief, I have been asked by
5 others who, at the end of the table, to
6 ask you to speak a little louder.

7 A. Yeah.

8 Q. Because they have a
9 difficulty hearing. So would you
10 please, when you answer my questions,
11 please project, if you would.

12 A. Okay.

13 Q. So is it -- I asked you how
14 old you were, Chief.

15 How old were you at the
16 time of the -- of March of last year?

17 In March of 2024, how old were you?

18

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1 MR. BERNSTEIN: Chief, you
2 may answer that question: How
3 old were you last March?

4 THE WITNESS: One month --
5 something.

6 MR. BERNSTEIN: No. How
7 old were you.

8 THE WITNESS: I was 43.

9 BY MR. JARRETT:

10 Q. 43. Thank you, sir.

11 And at that time, in March
12 of 2024, were you serving as the chief
13 engineer aboard the Motor Vessel Dali?

14 A. Yes, sir.

15 MR. BERNSTEIN: Go ahead.

16 BY MR. JARRETT:

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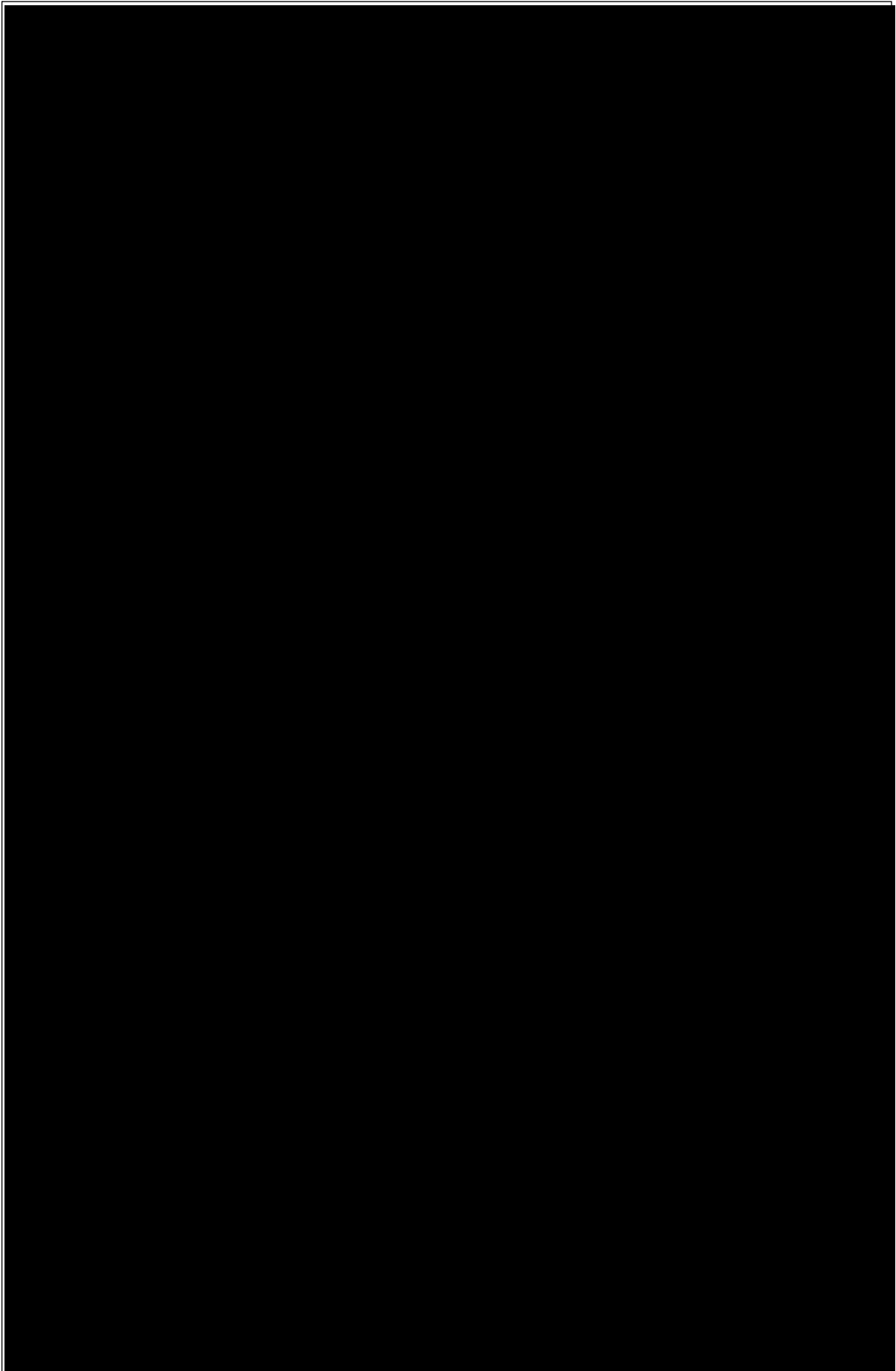
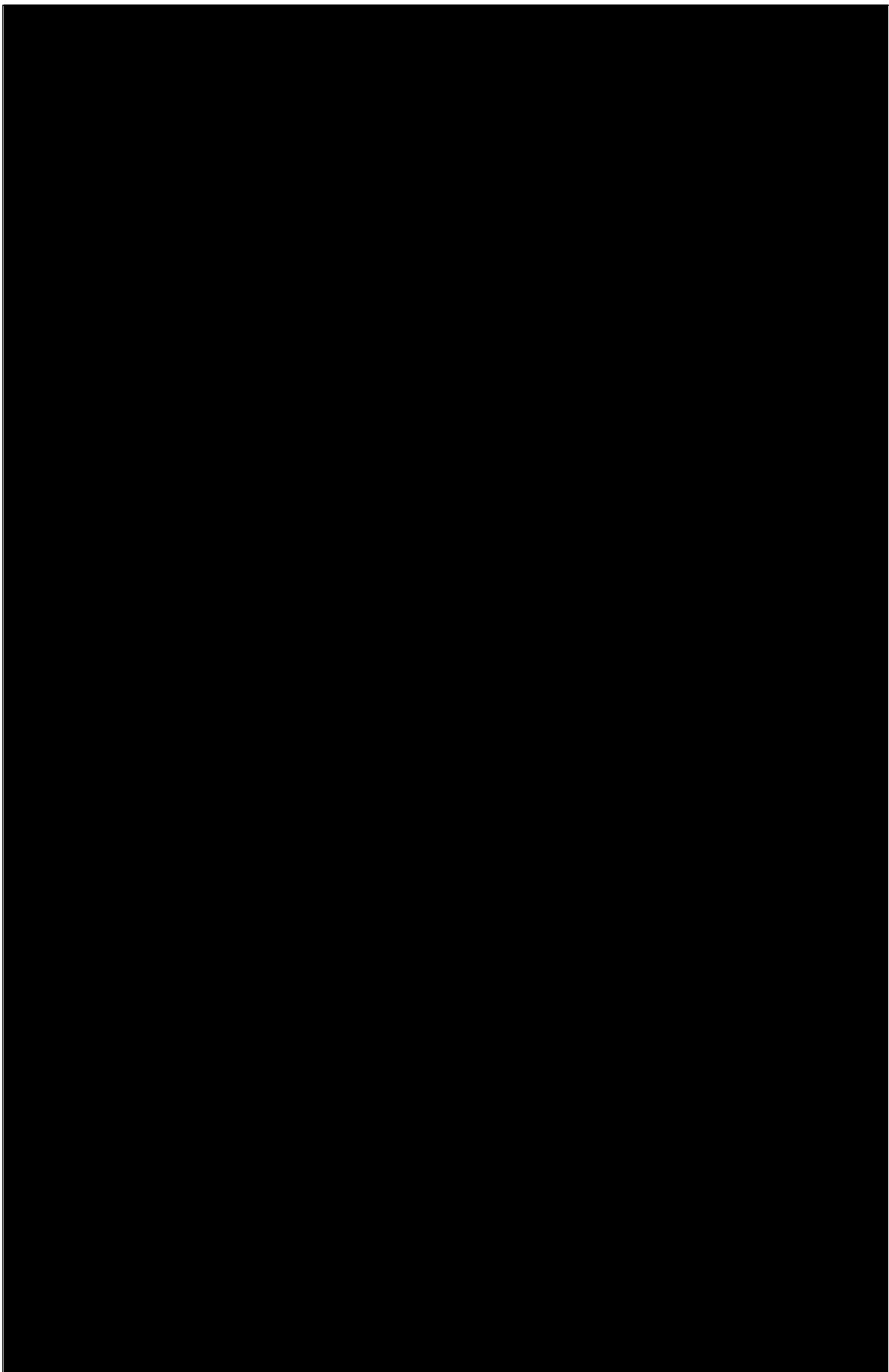
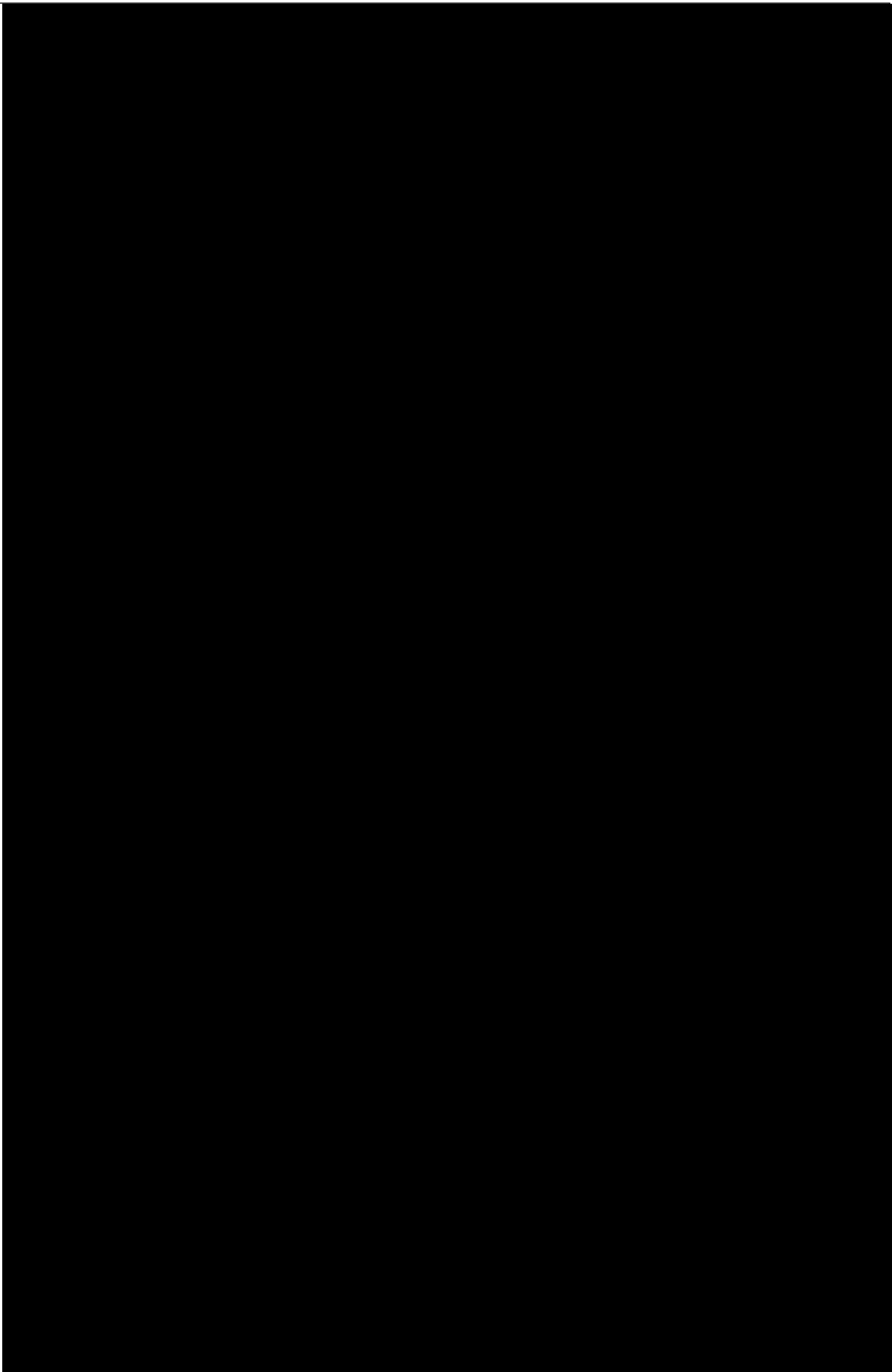


Exhibit 3

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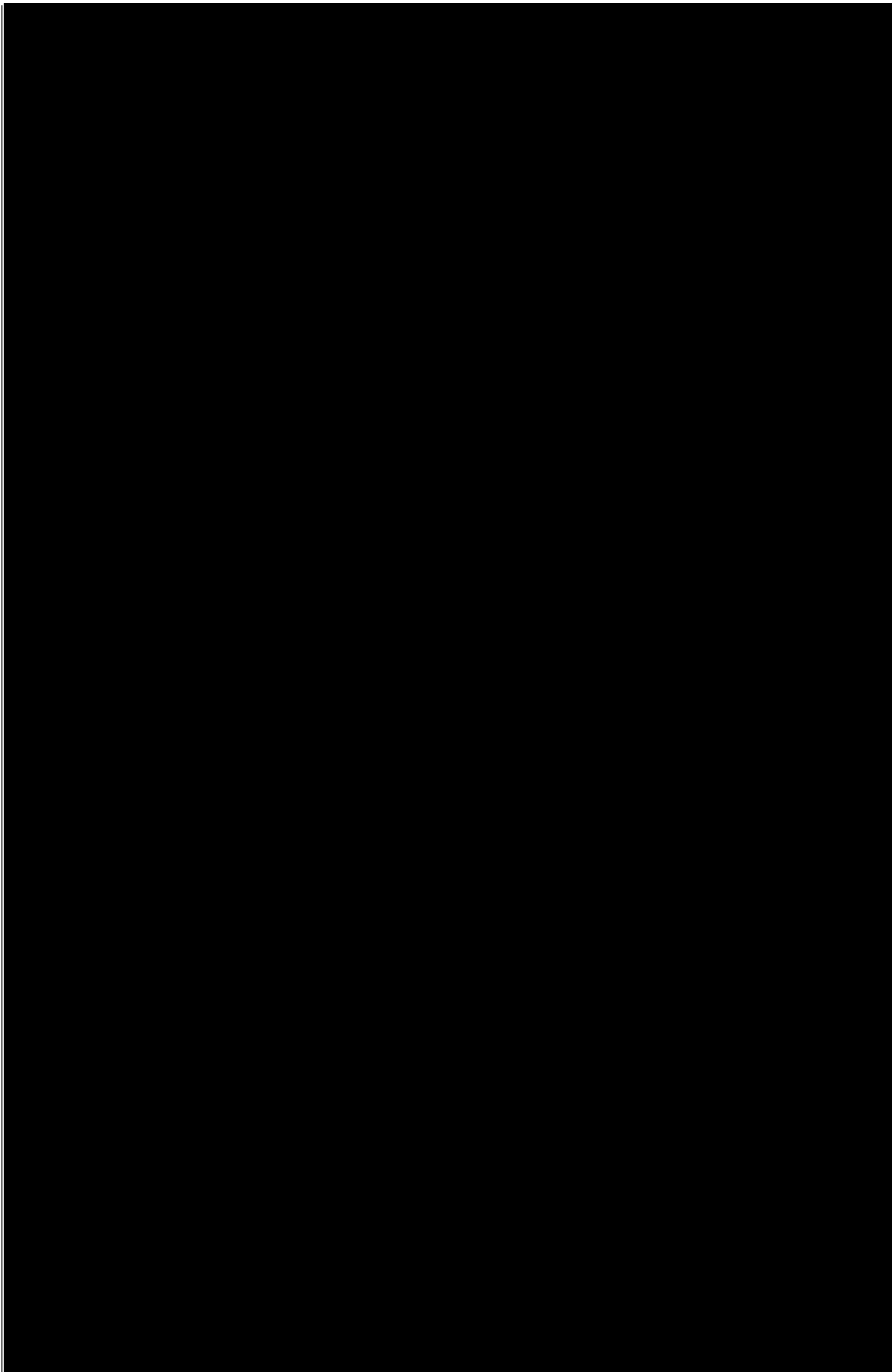
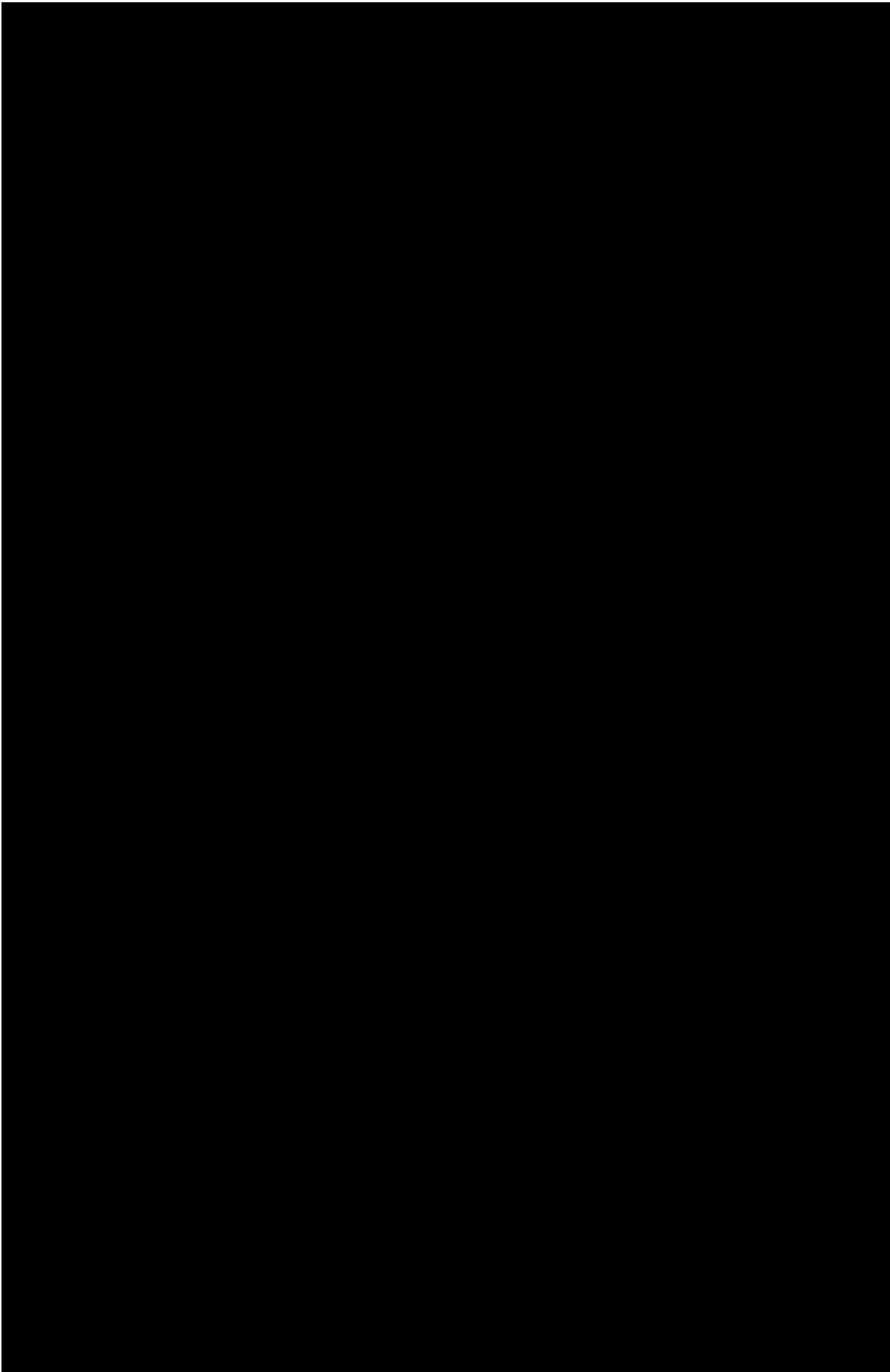


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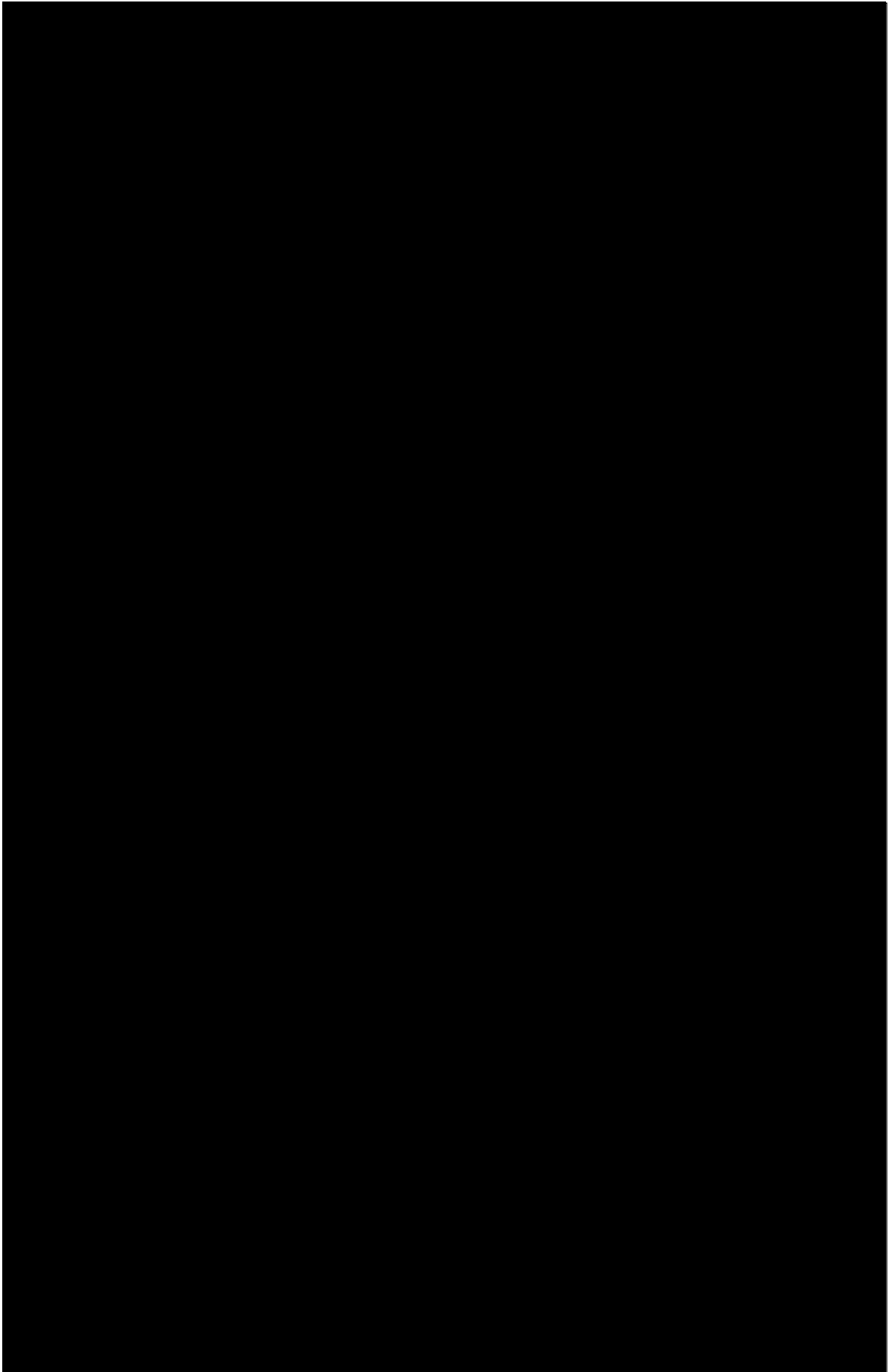
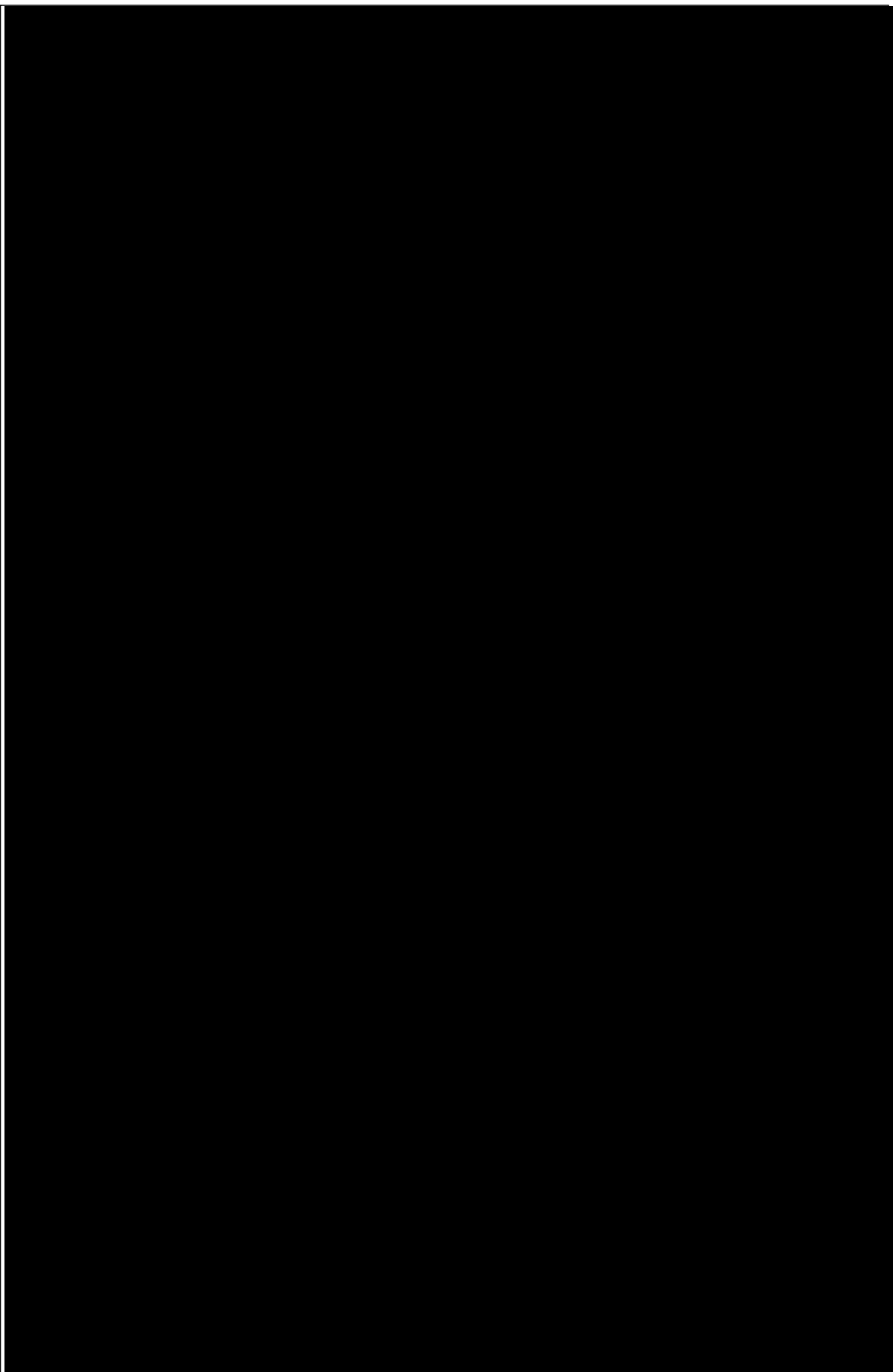
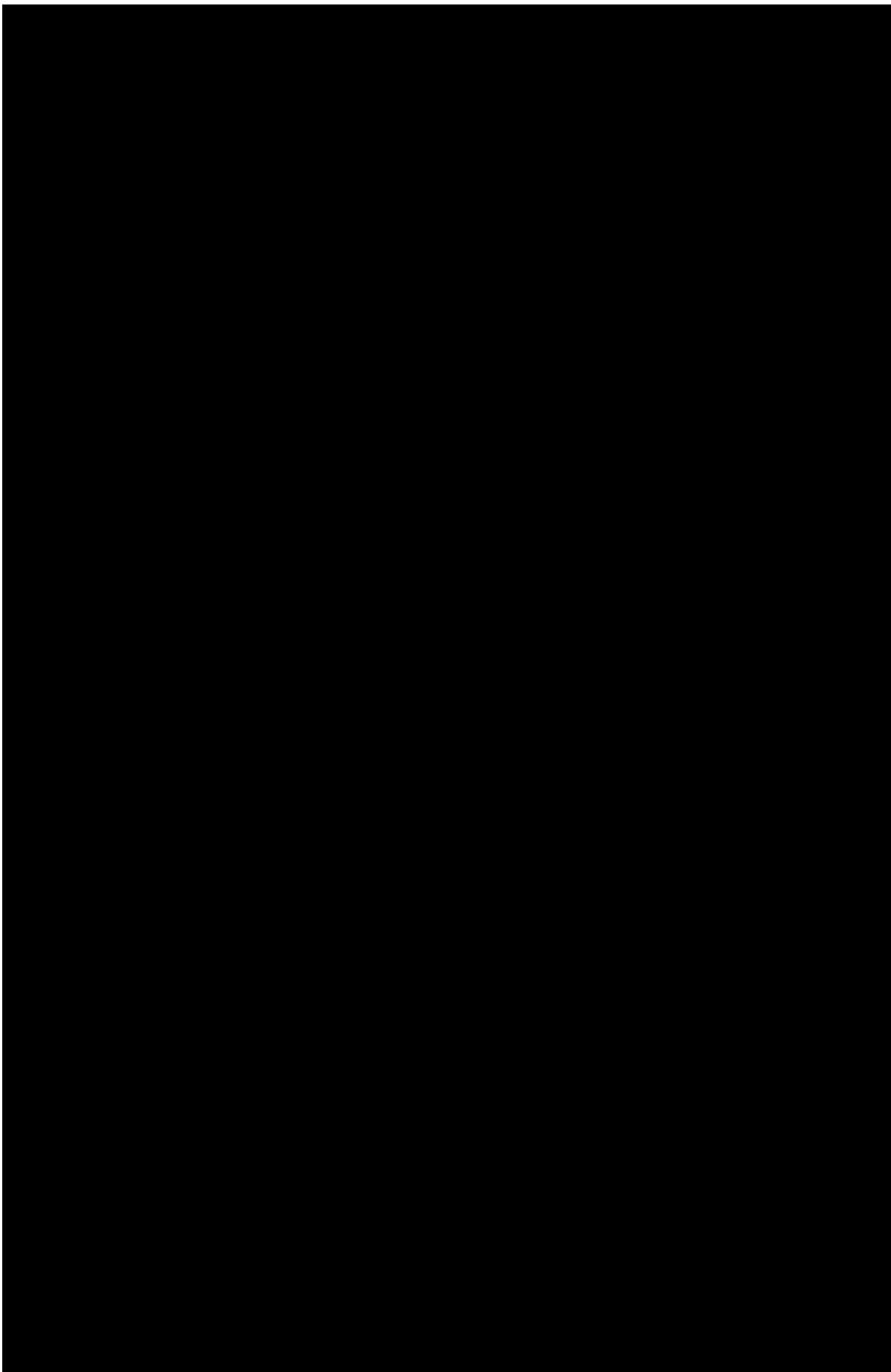


Exhibit 3

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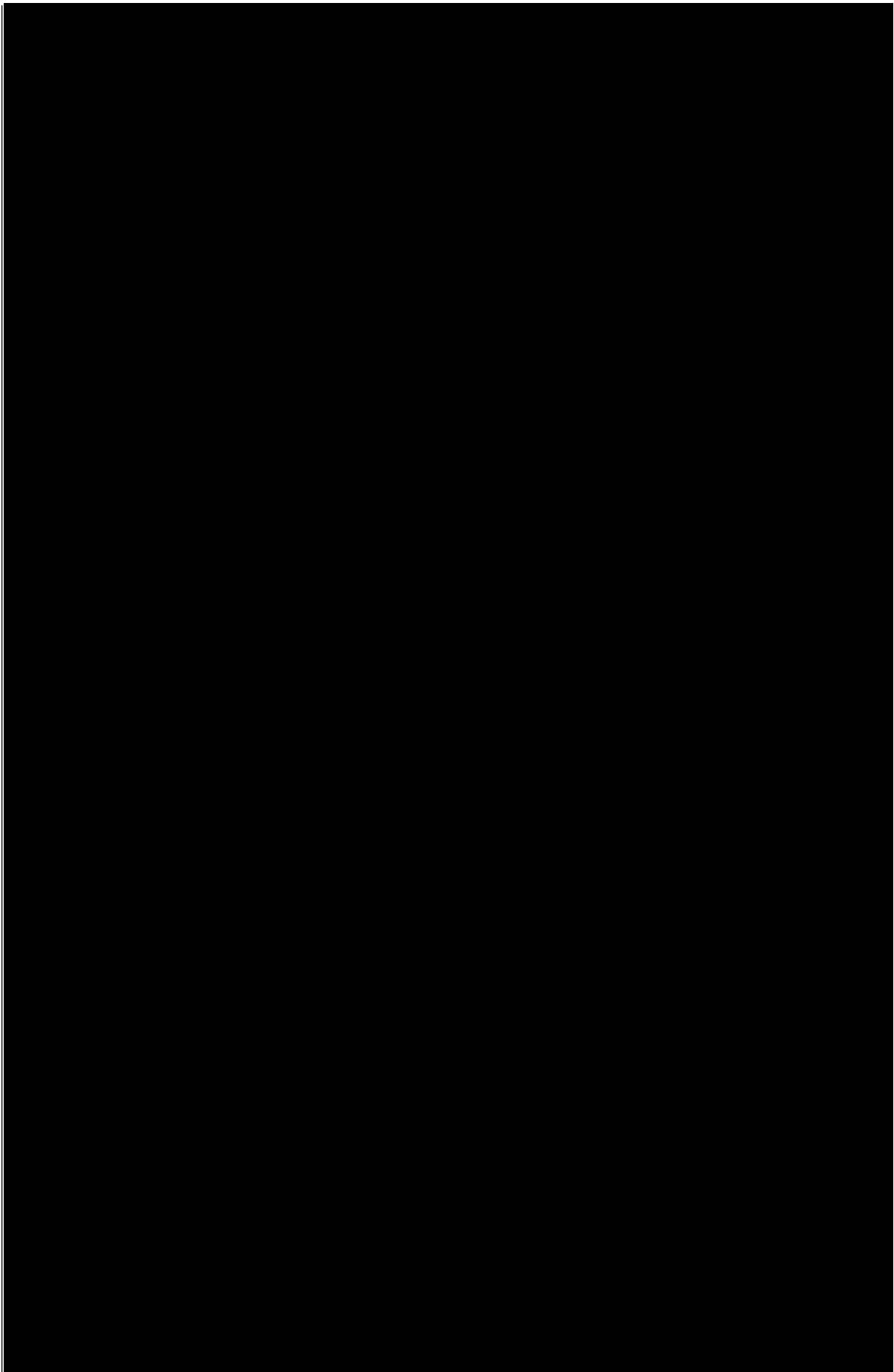
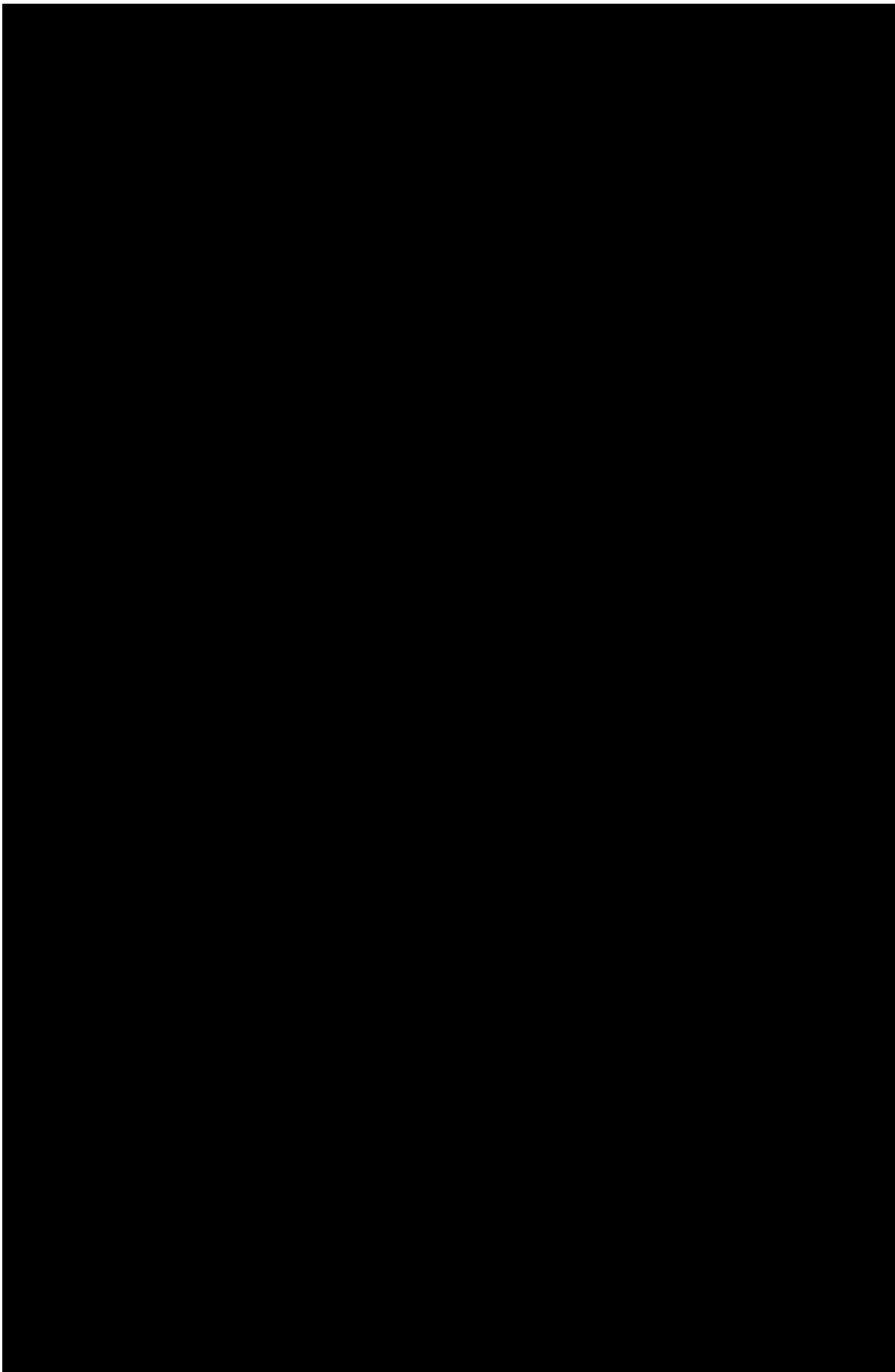
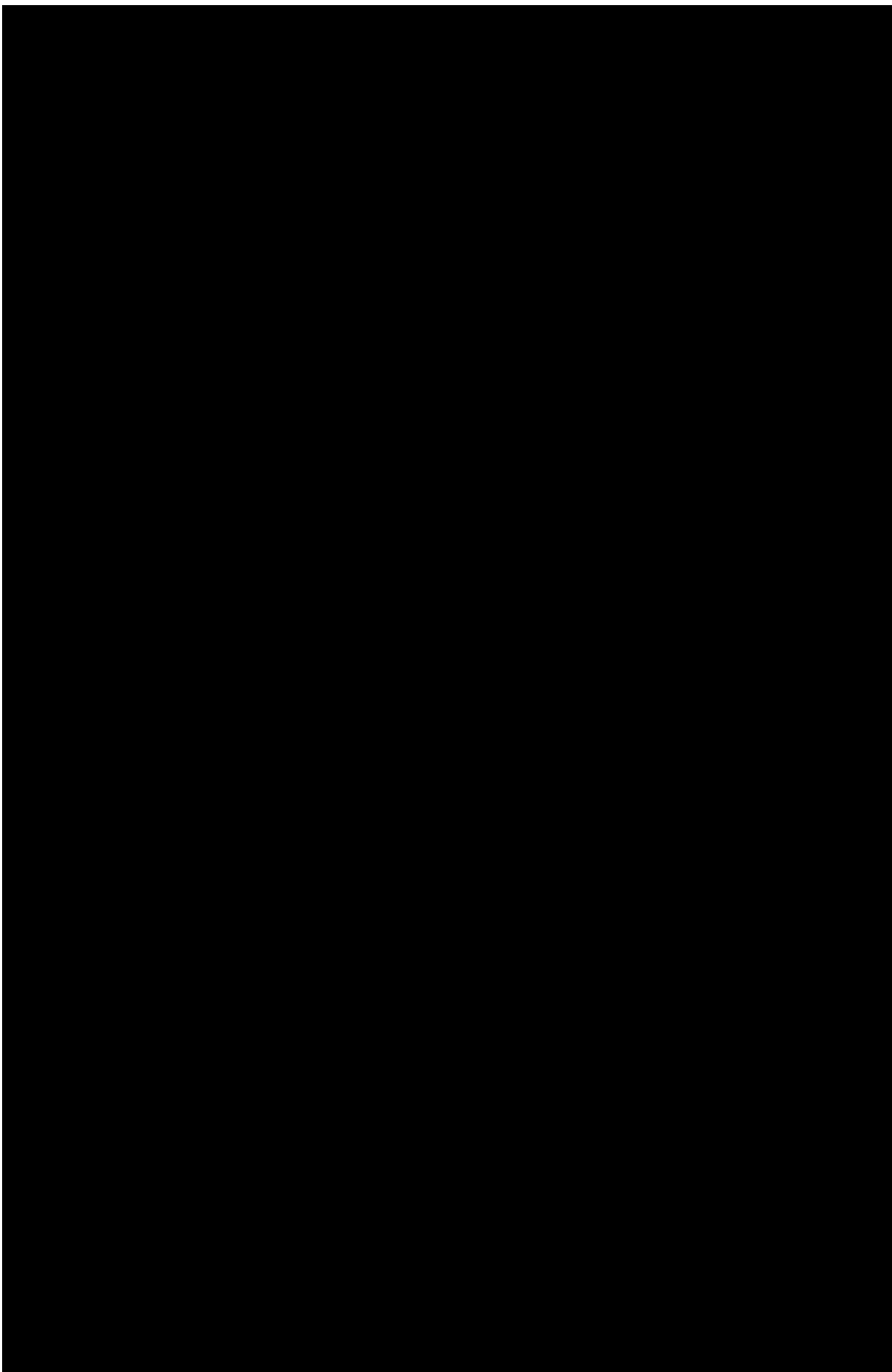


Exhibit 3

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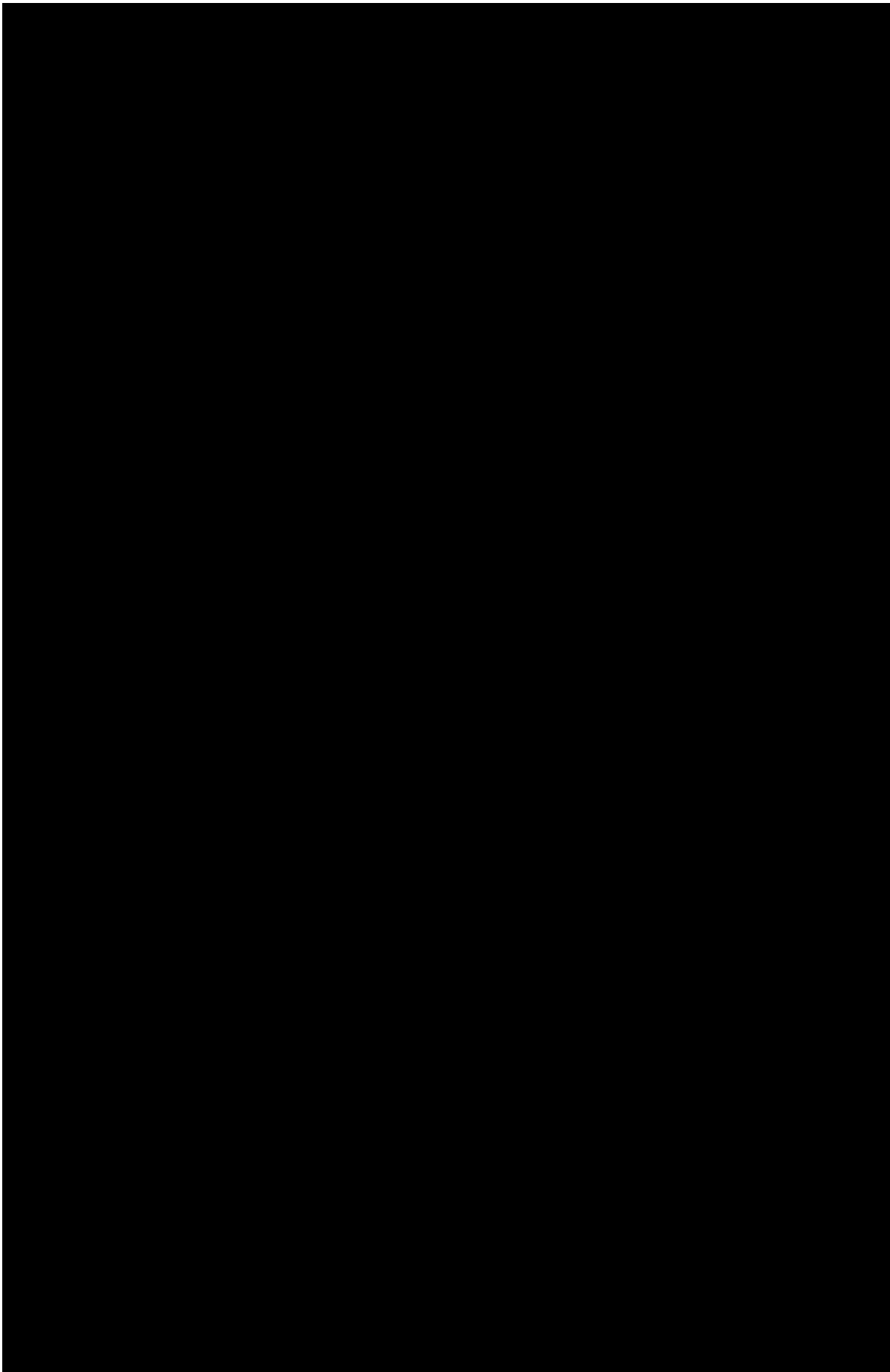
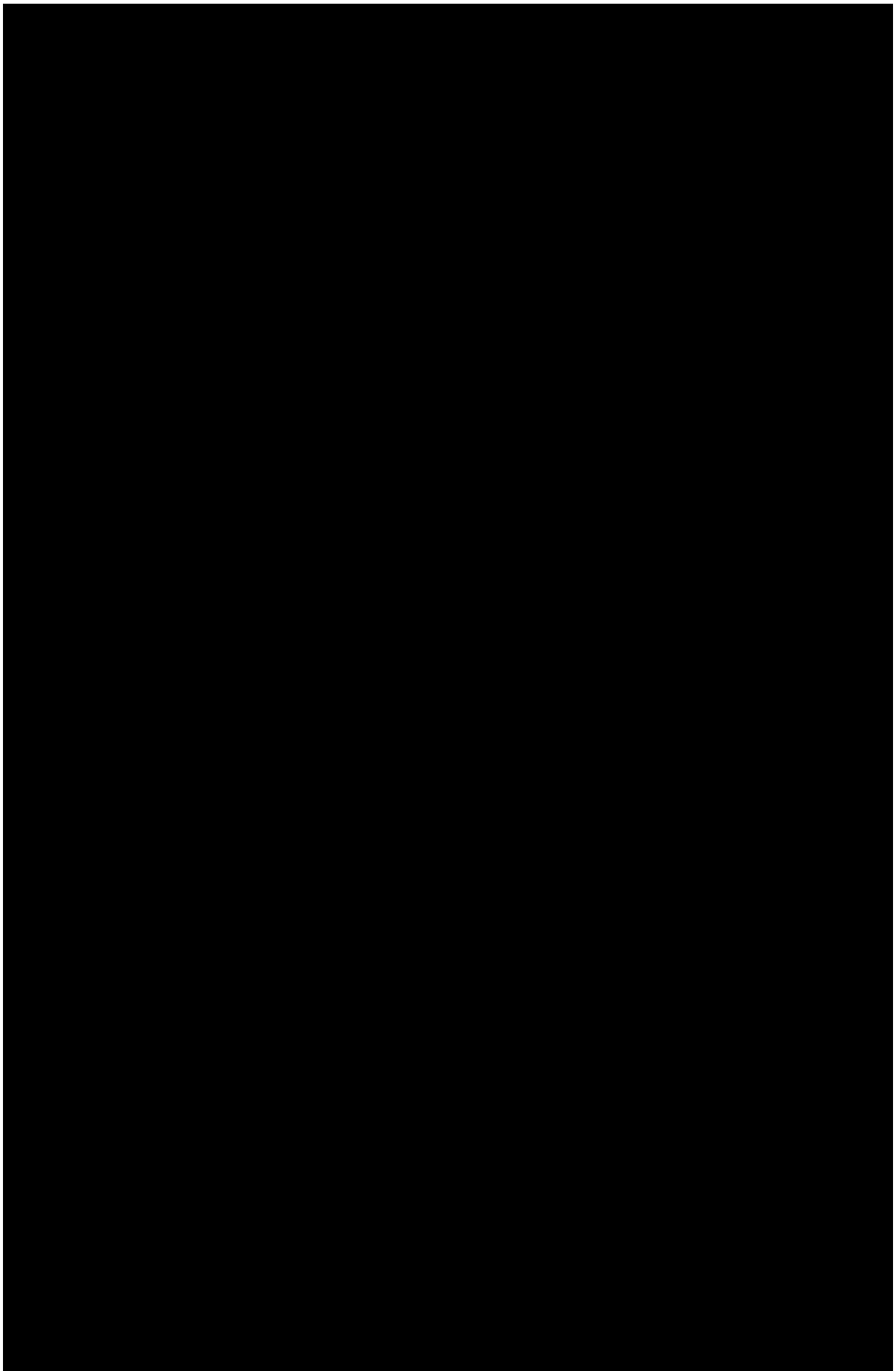


Exhibit 3

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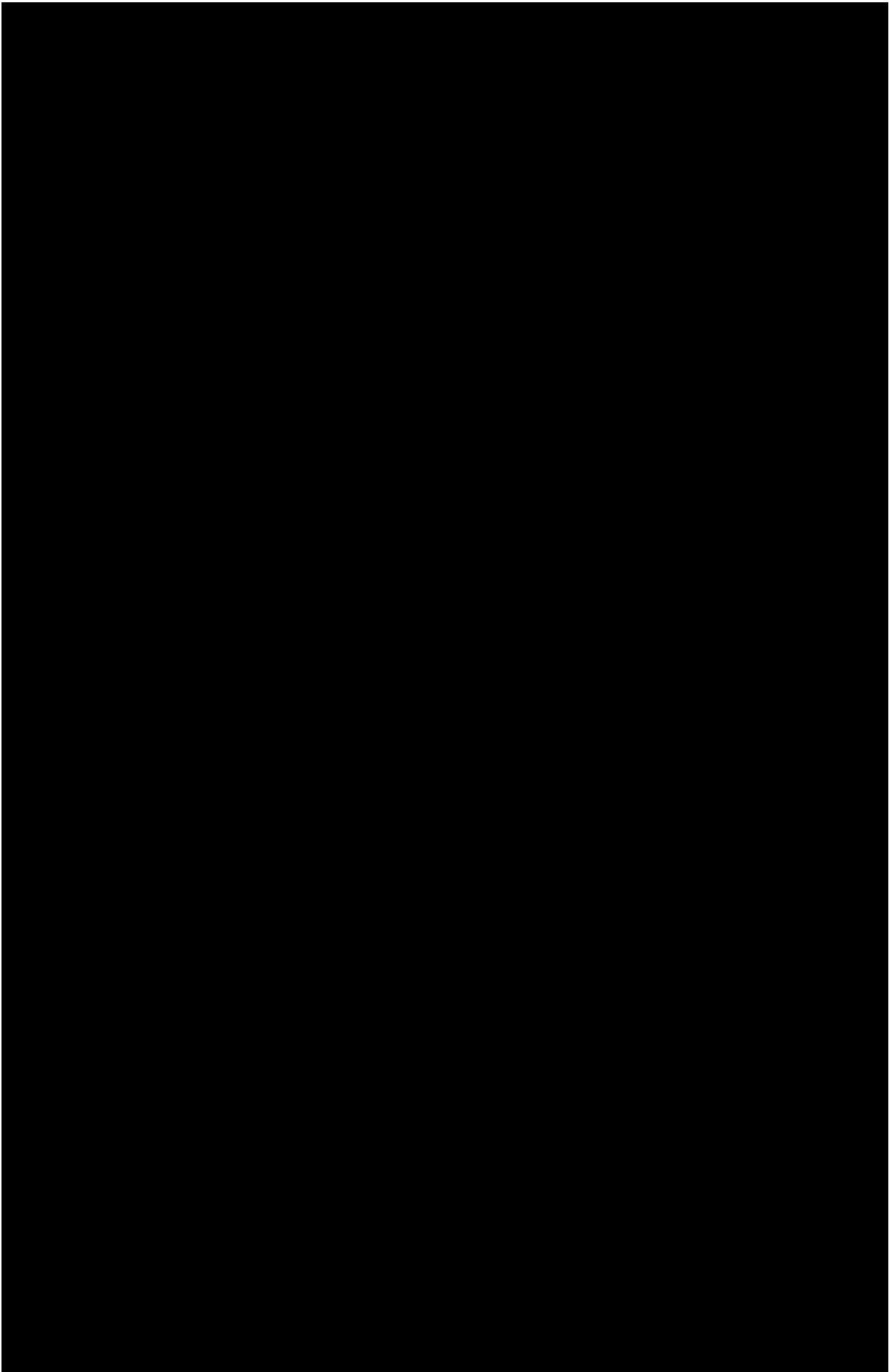
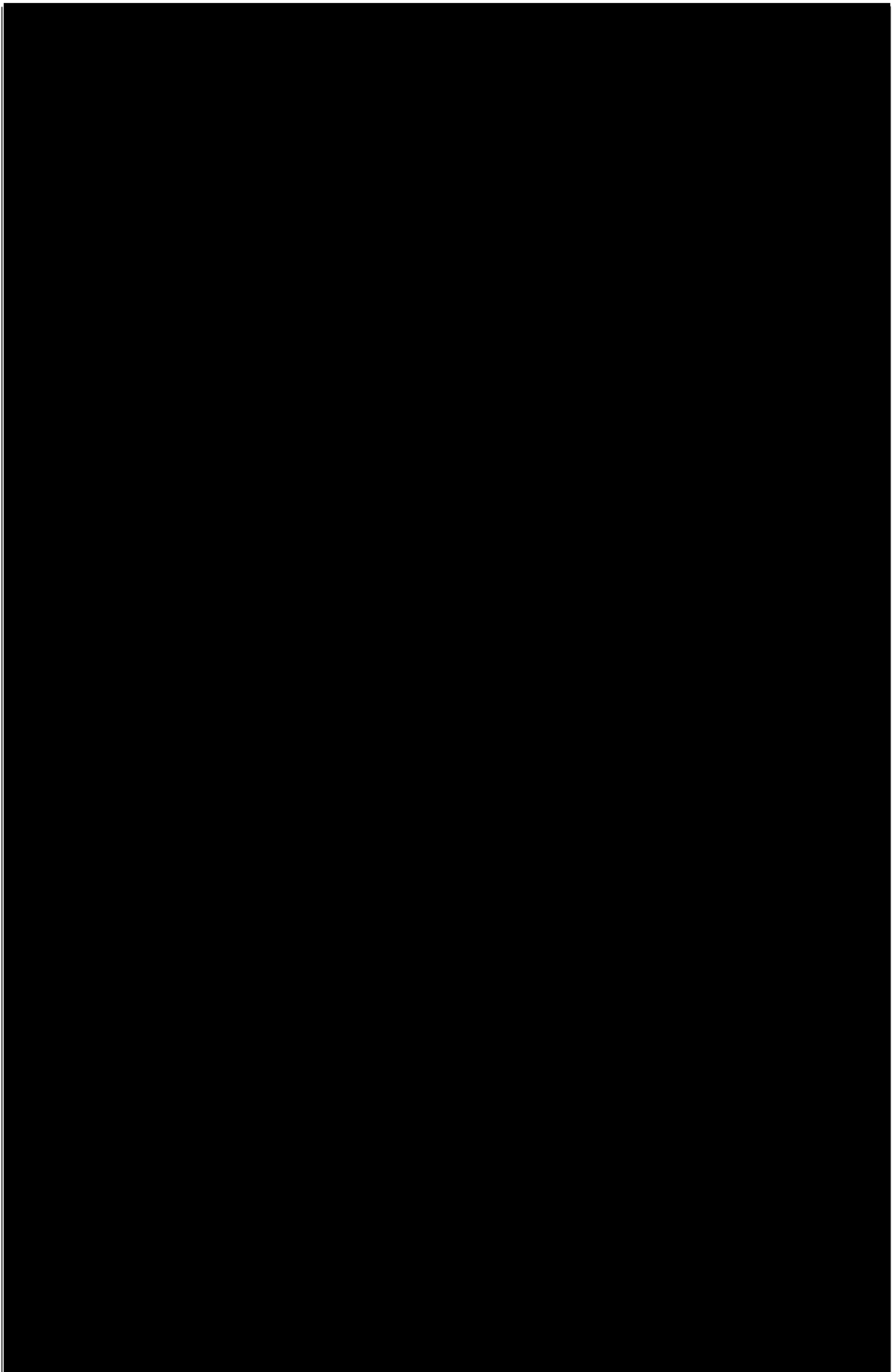
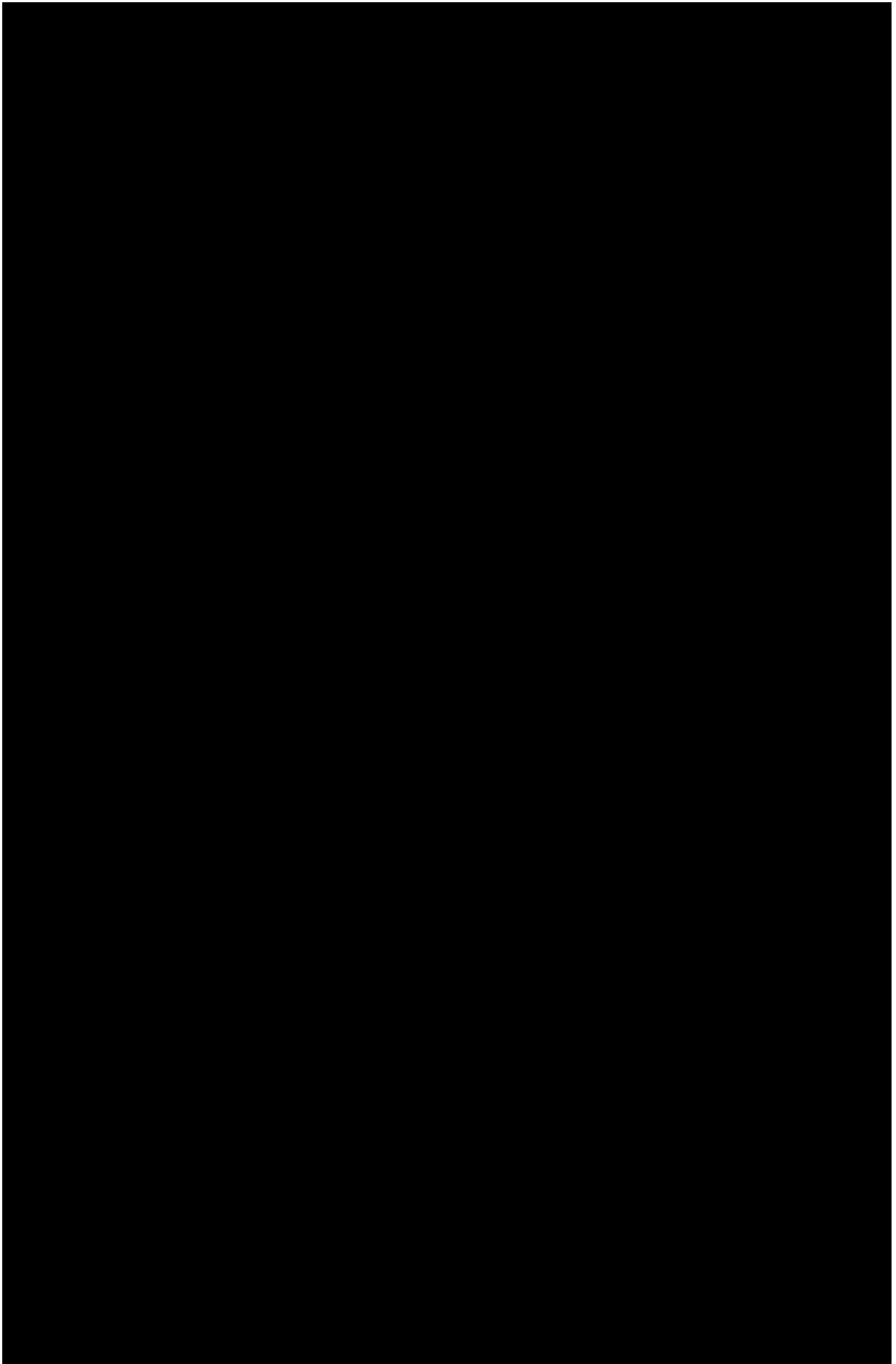


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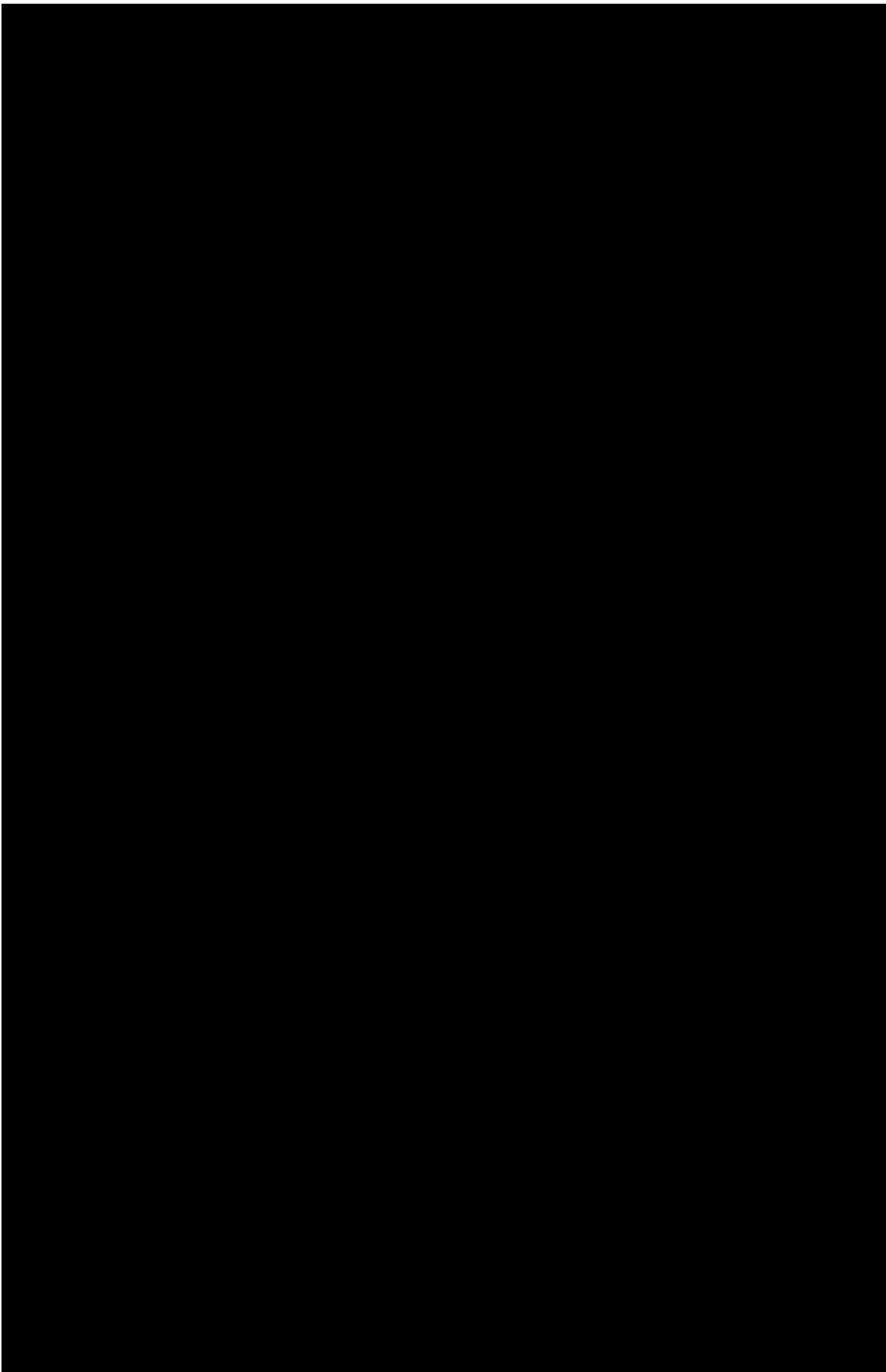
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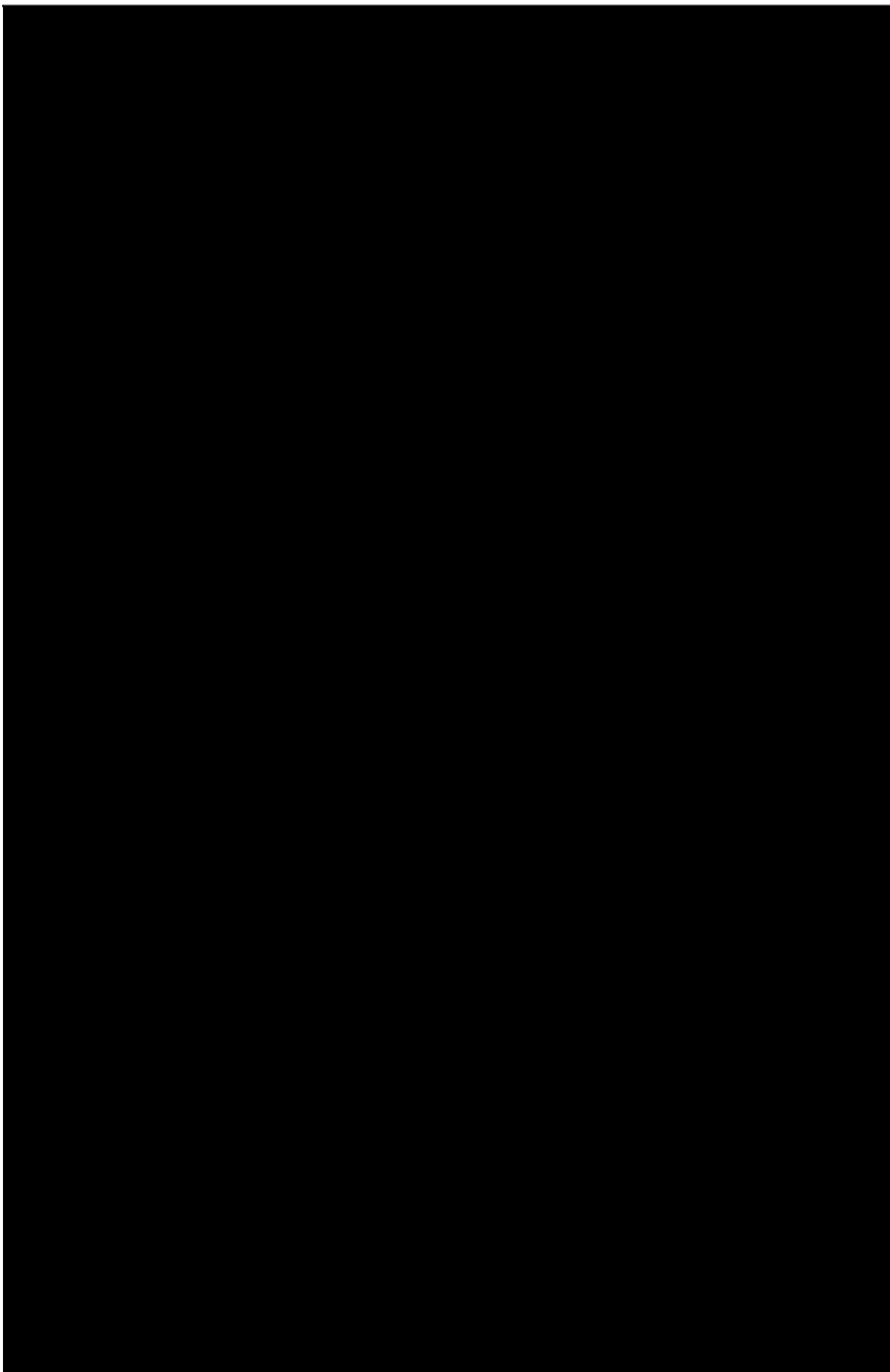
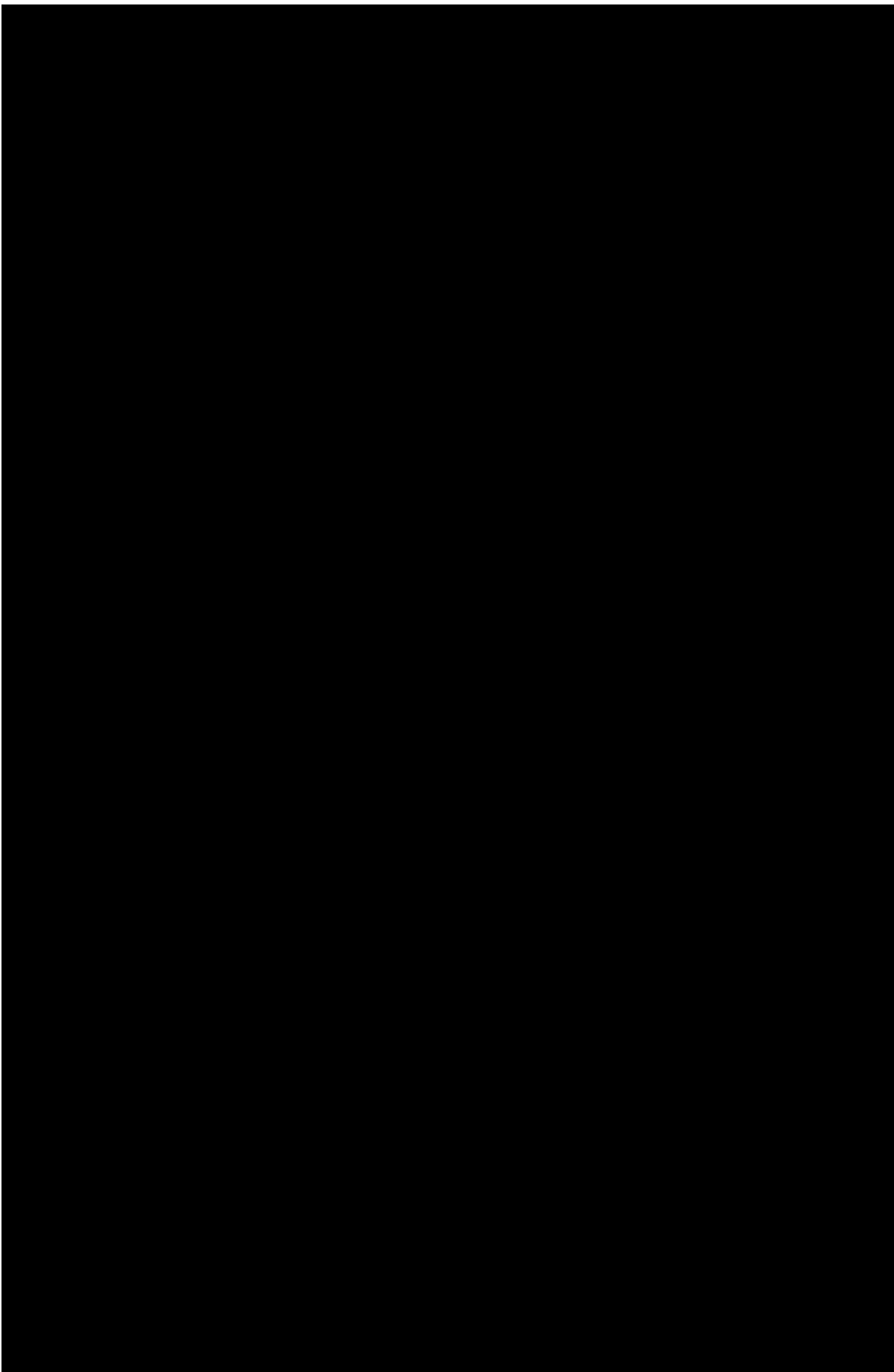
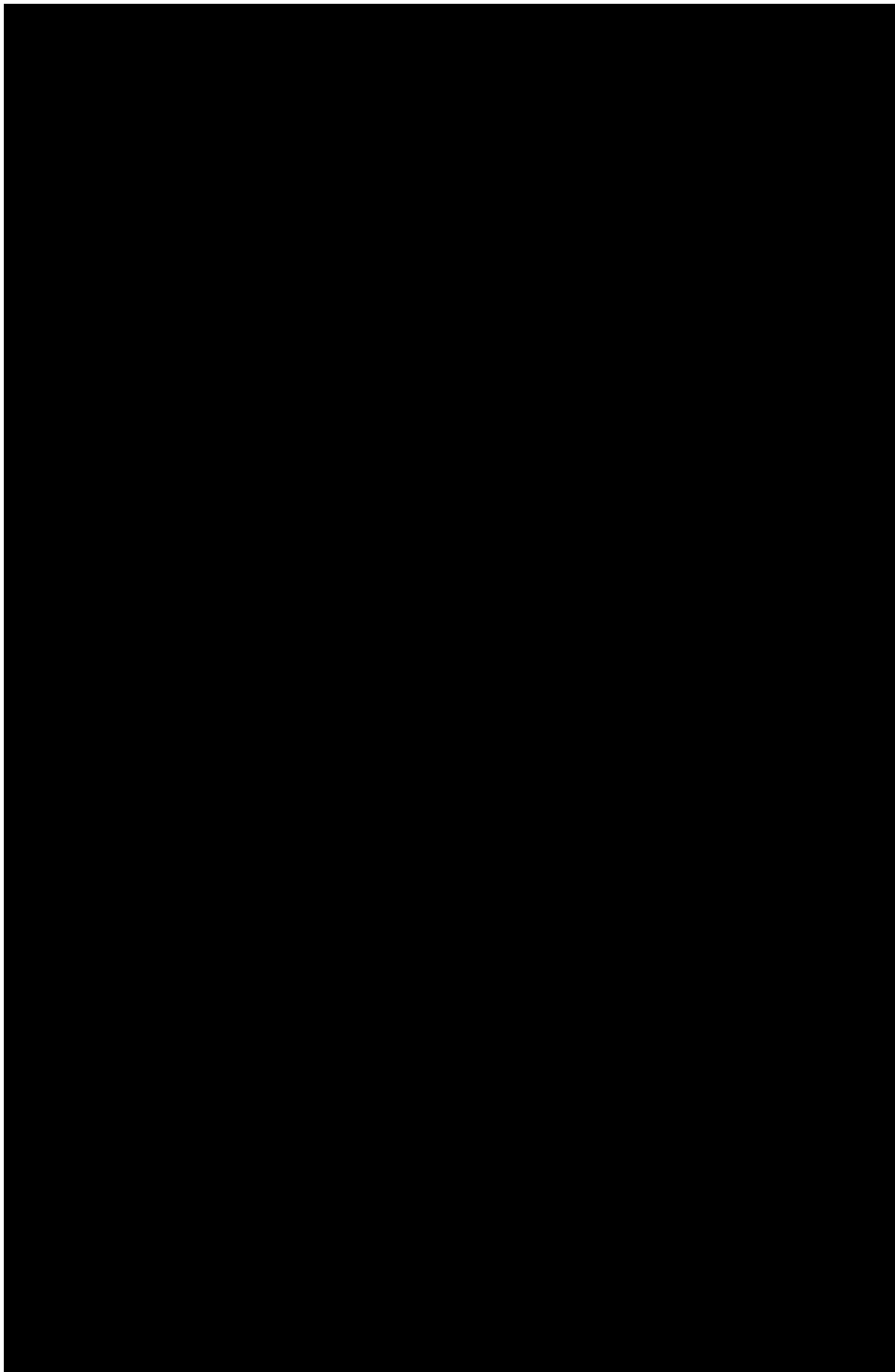


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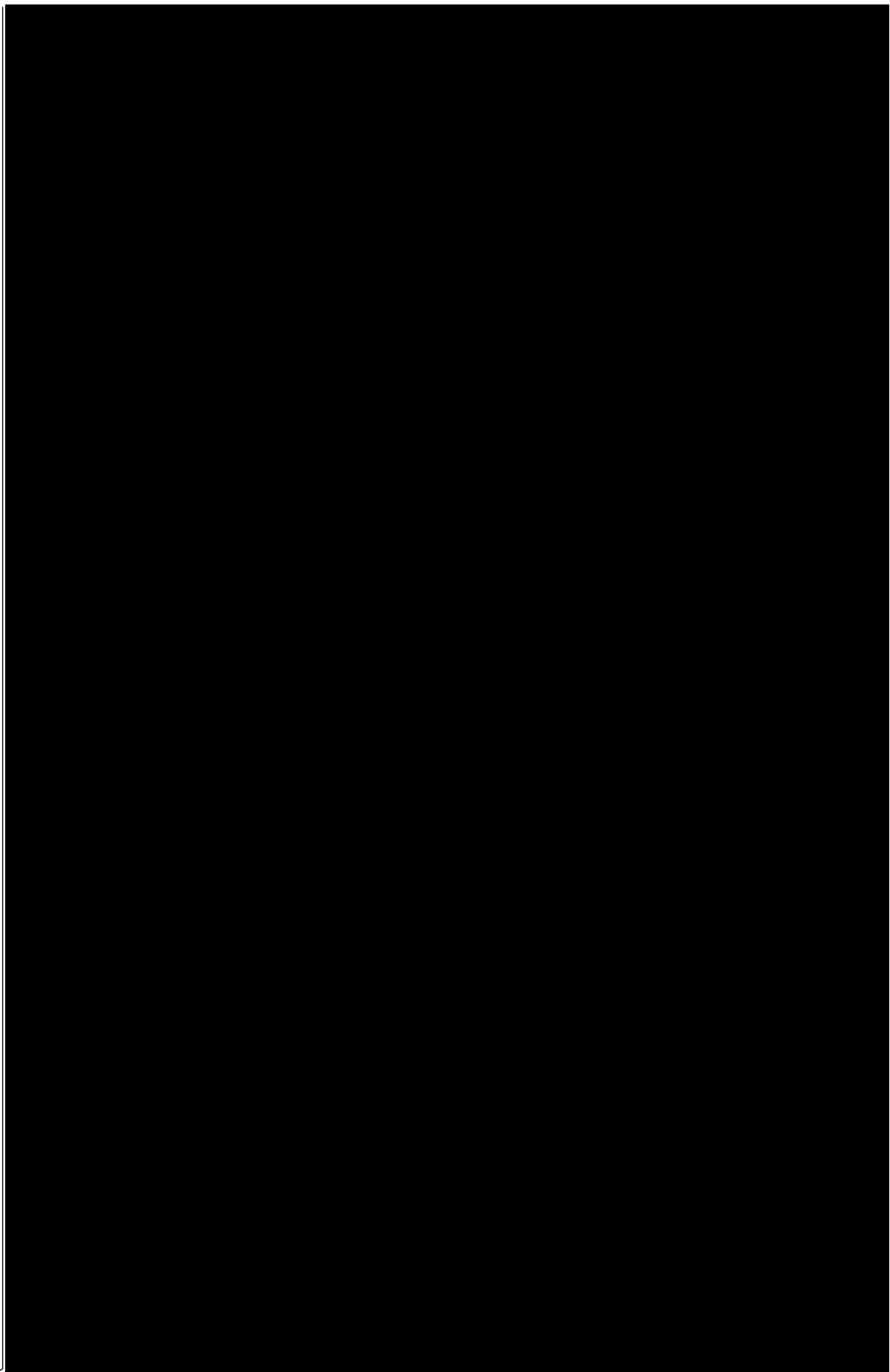


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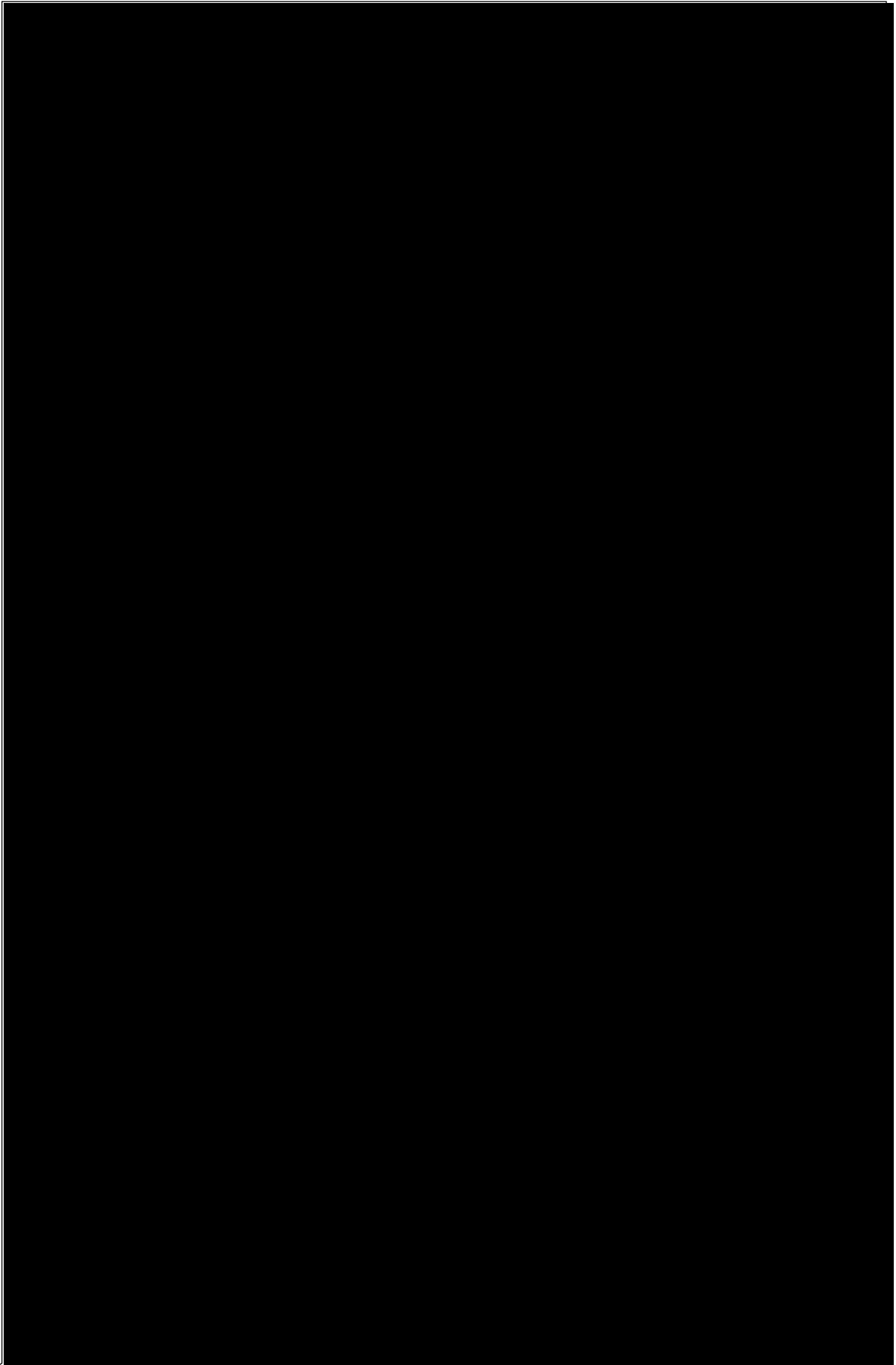
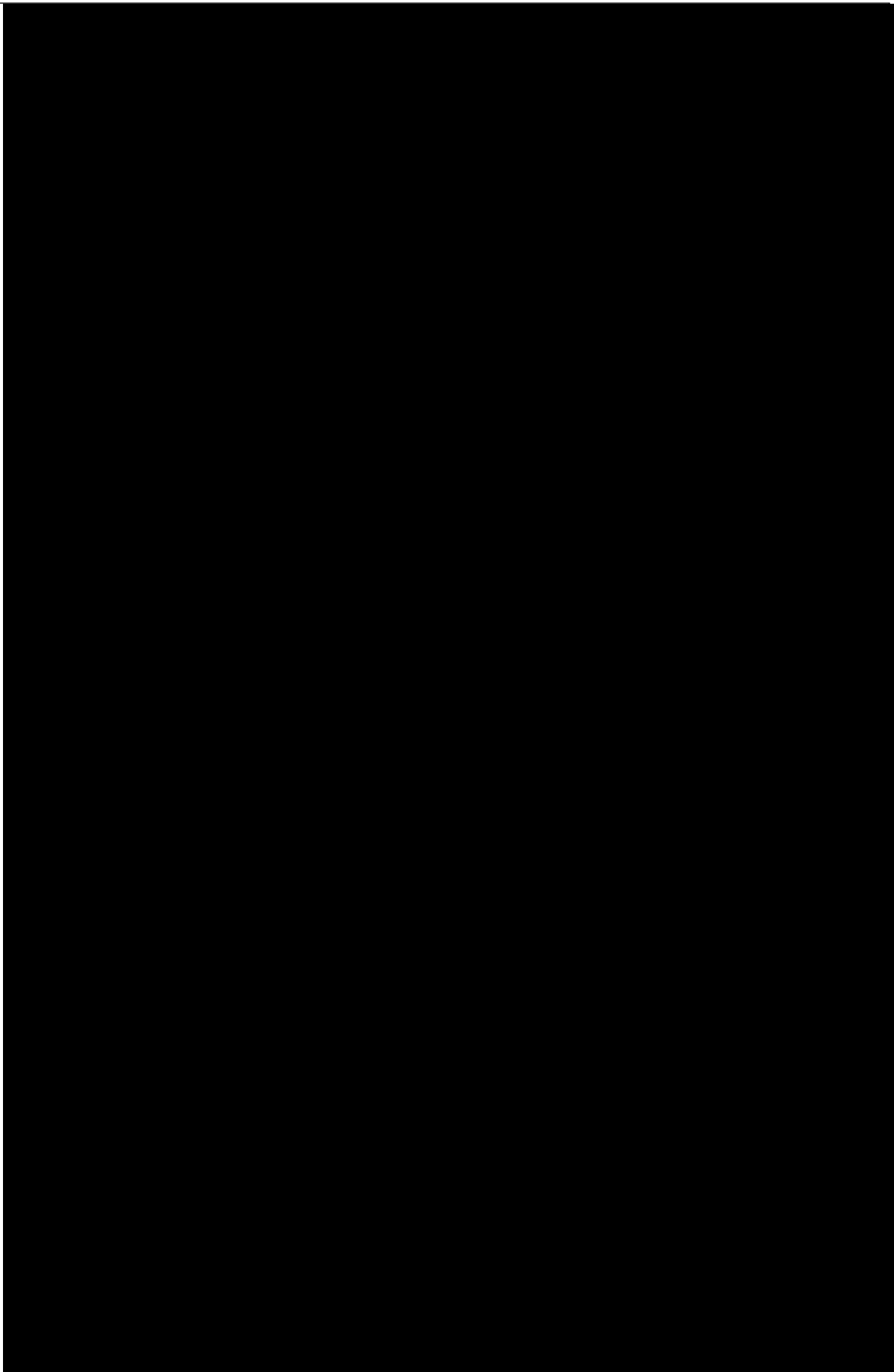
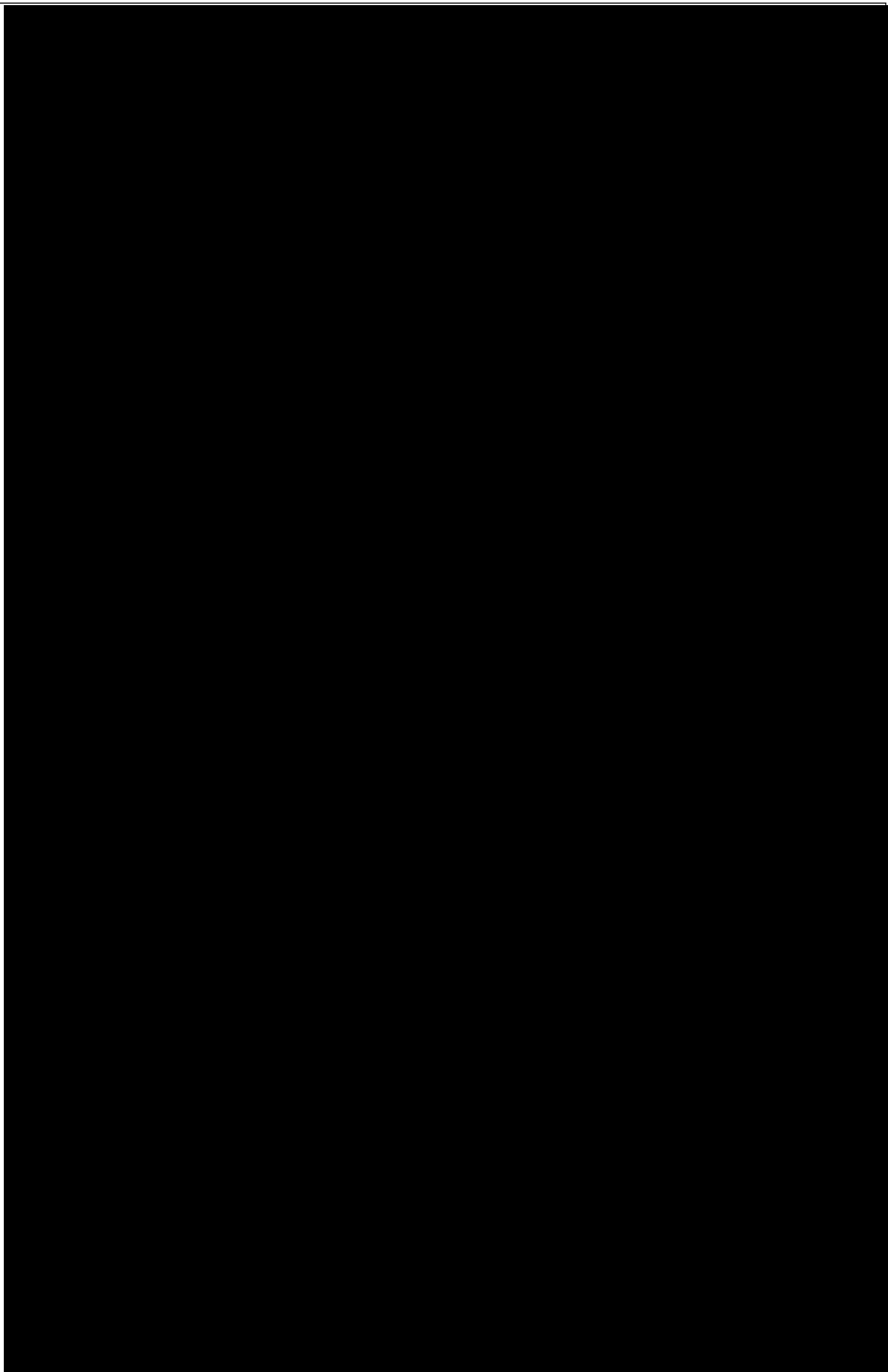


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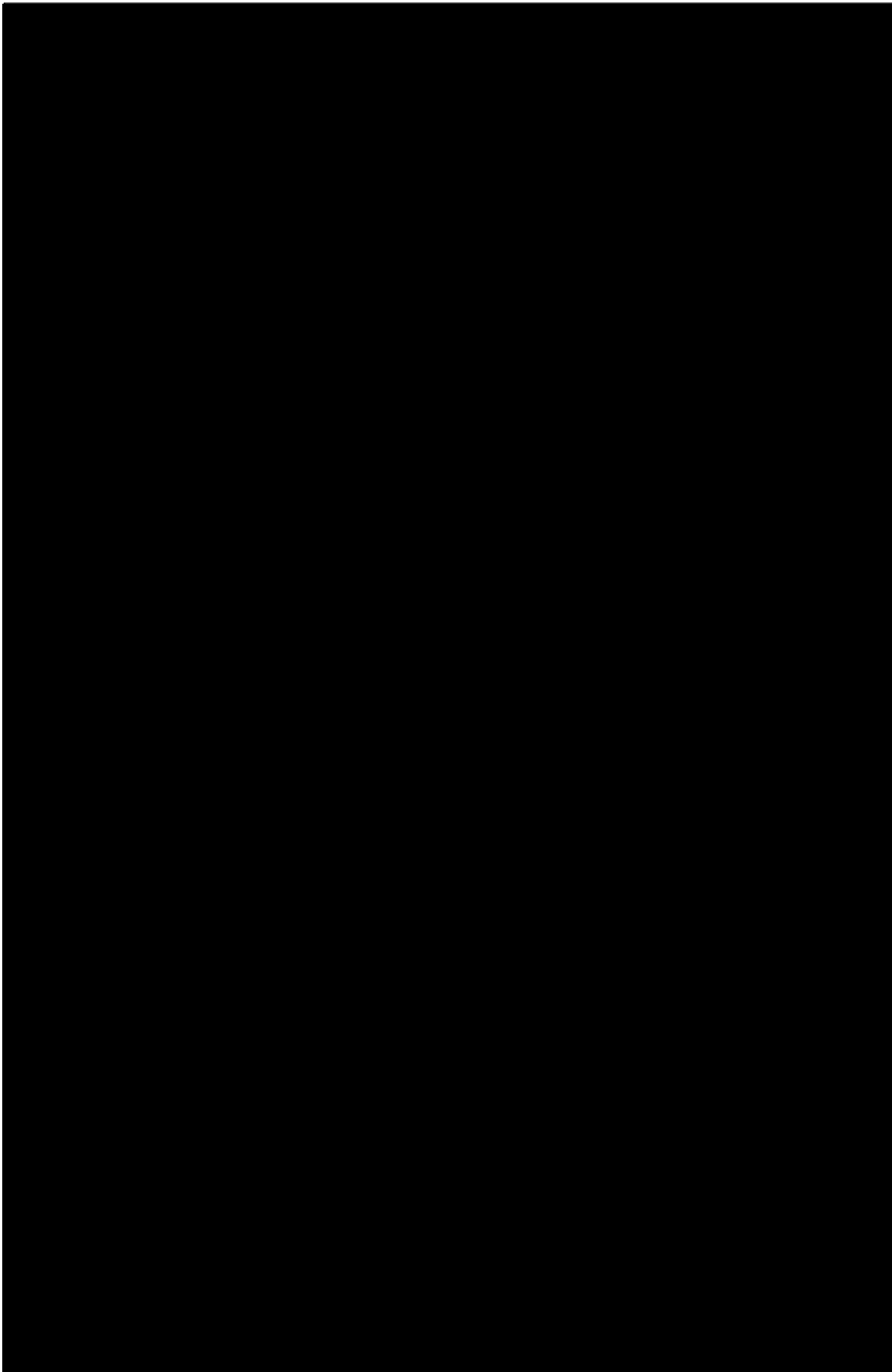
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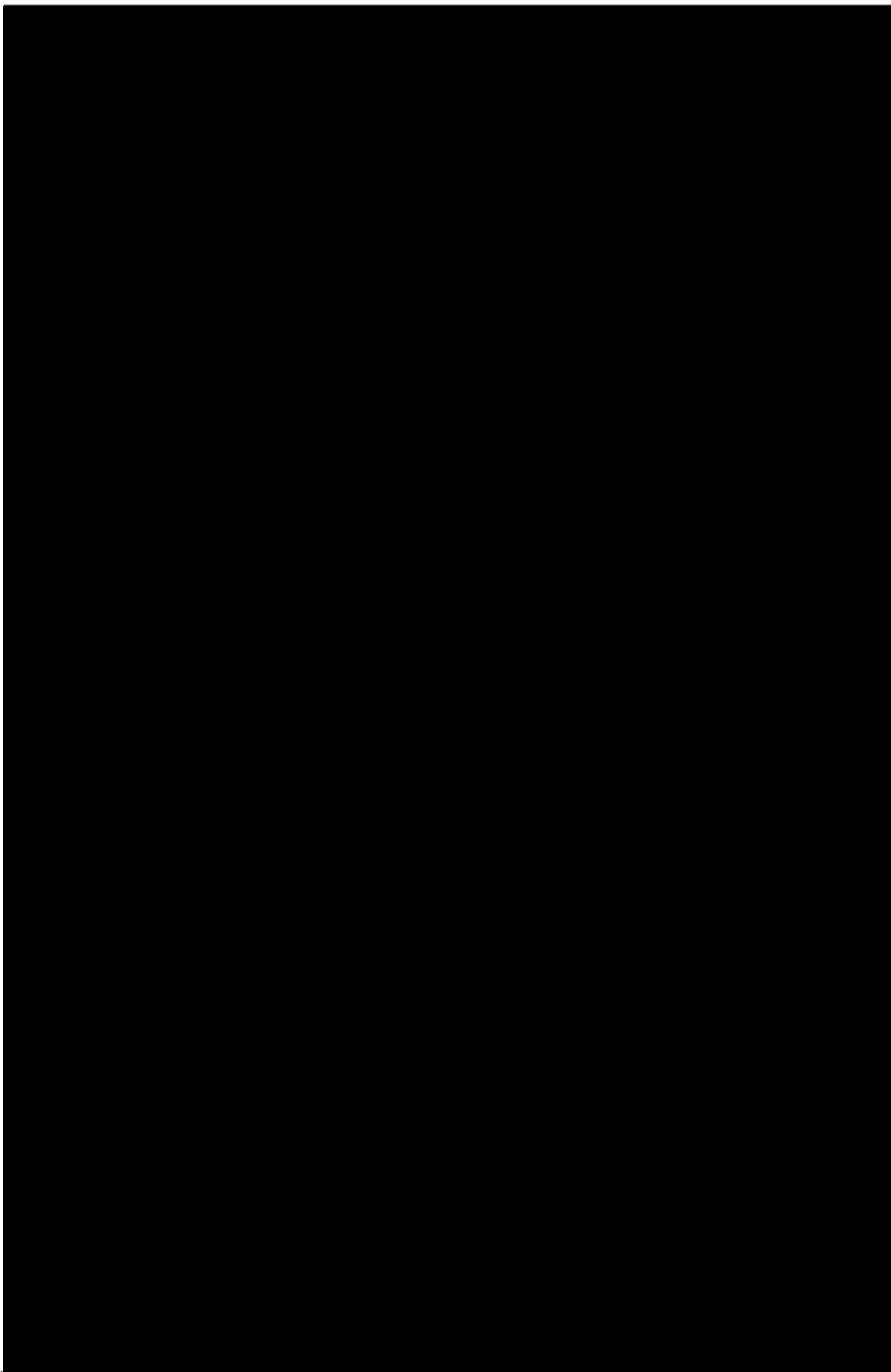
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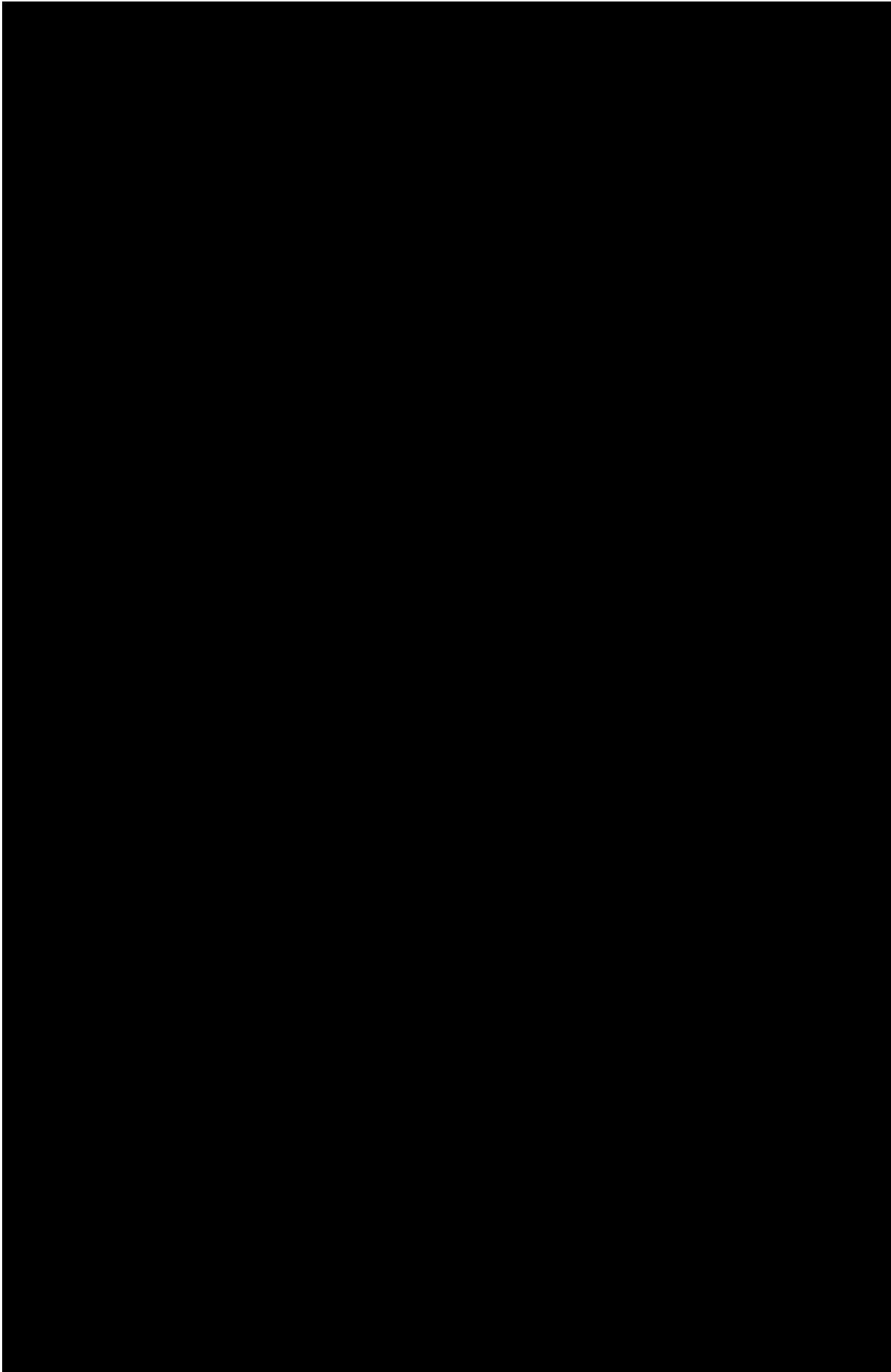
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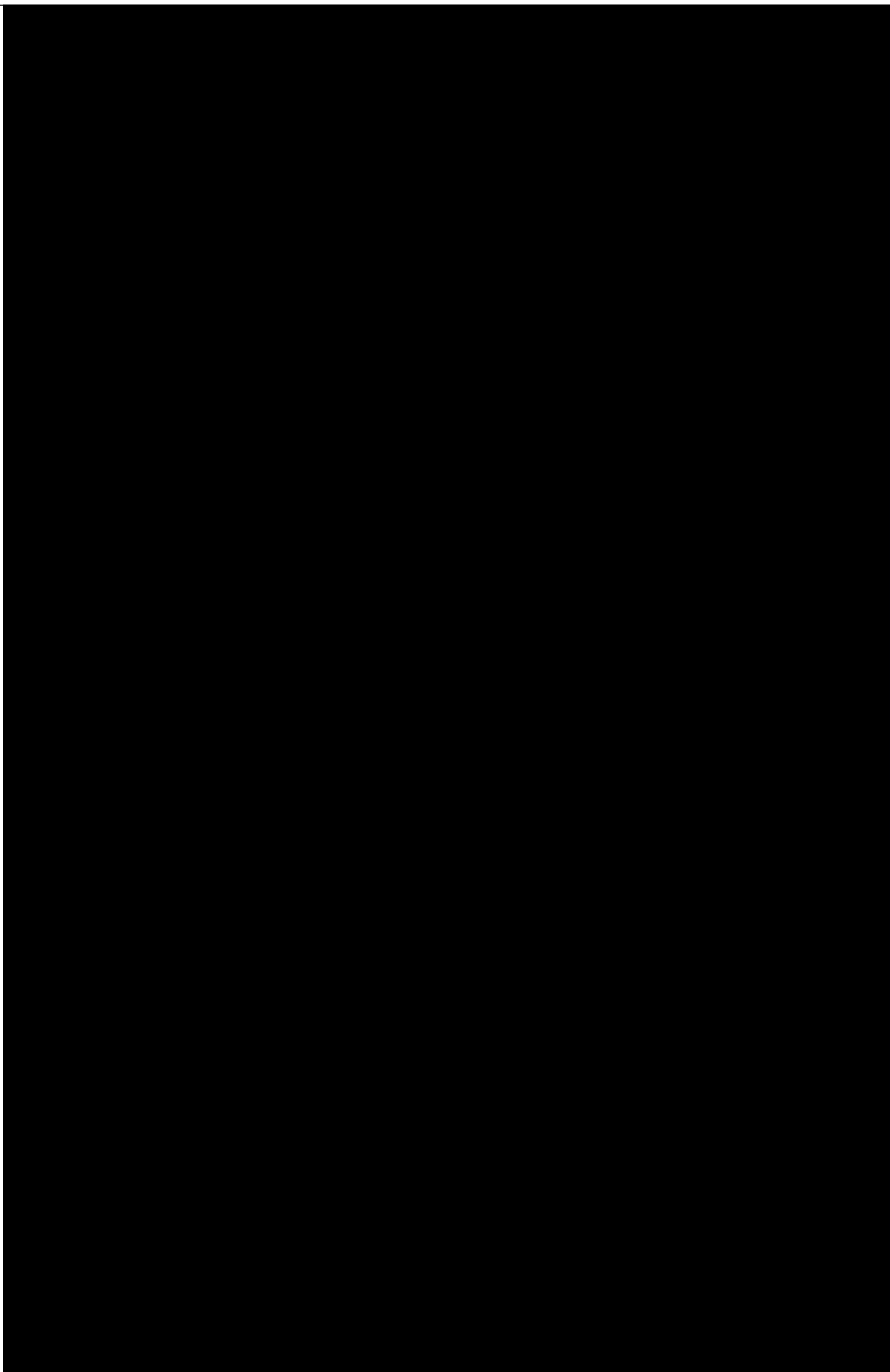
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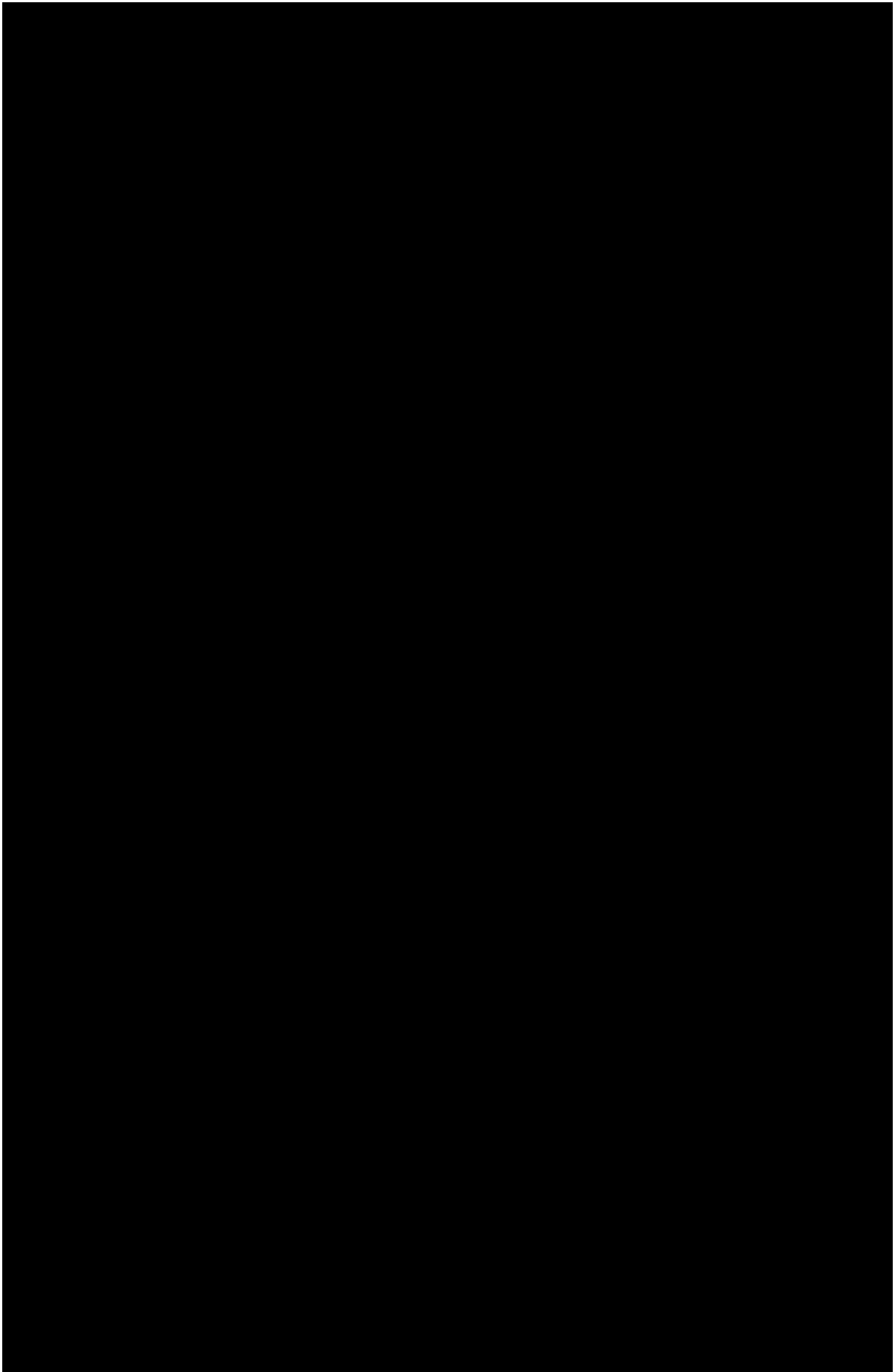
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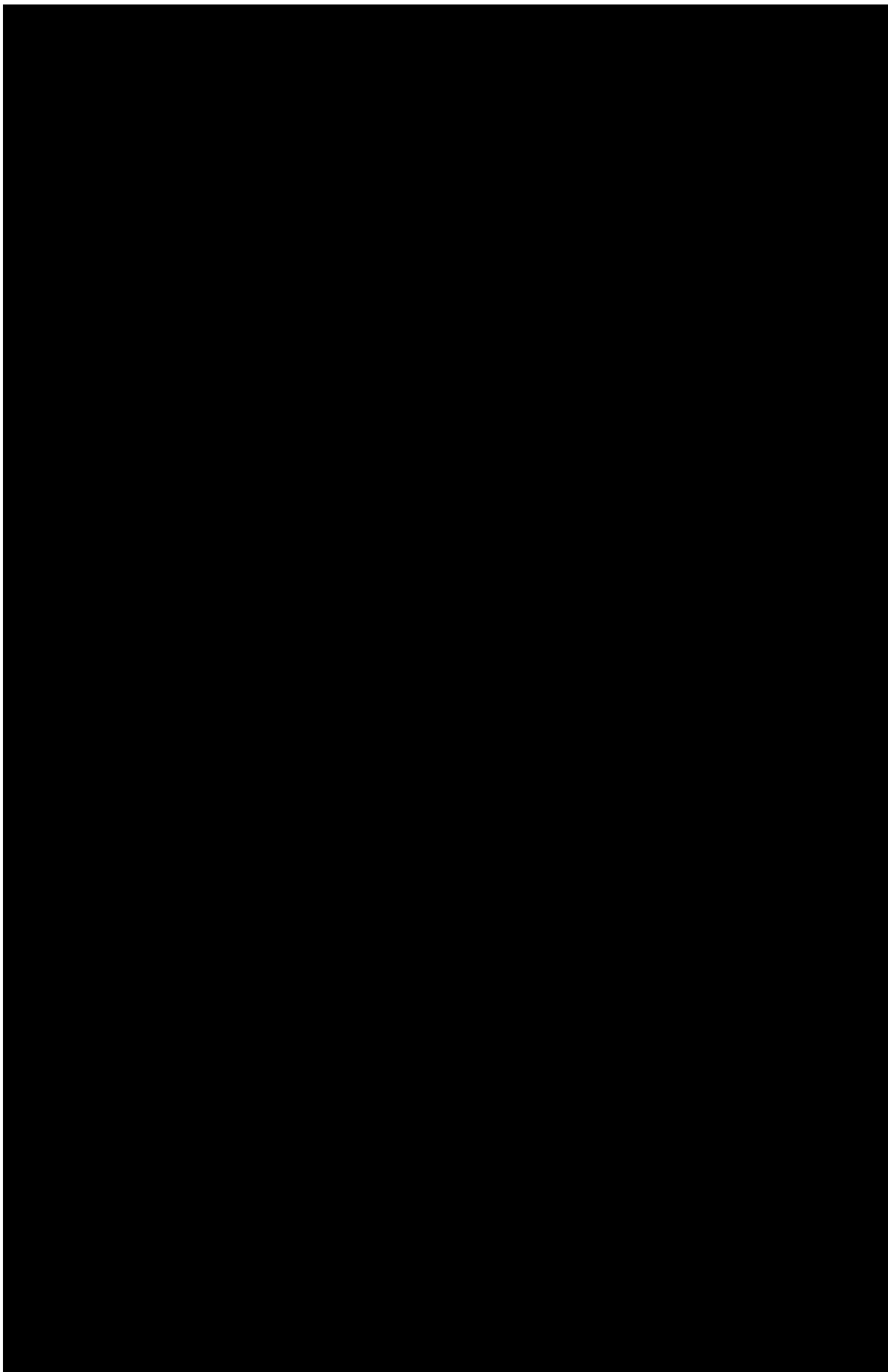
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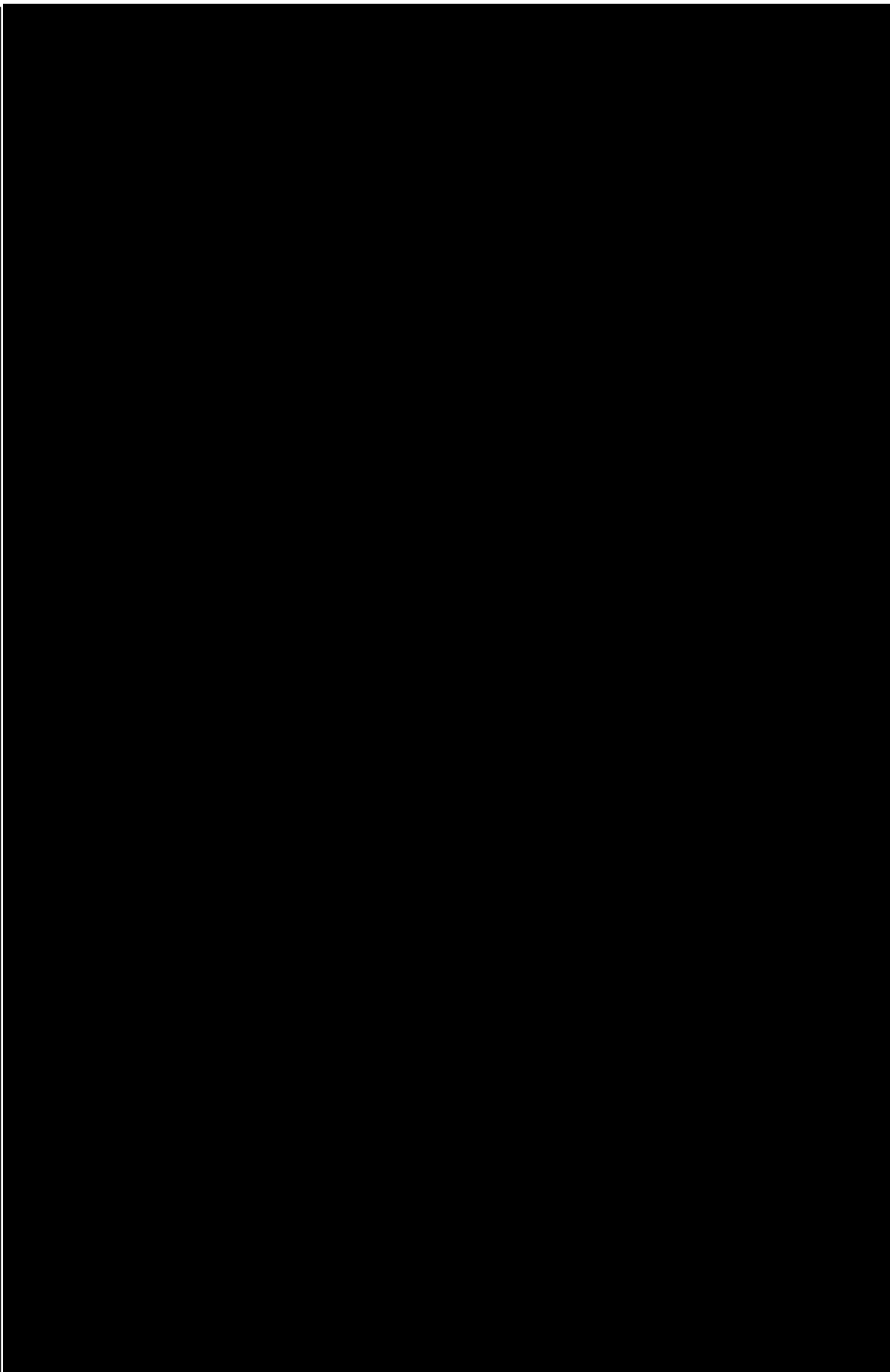
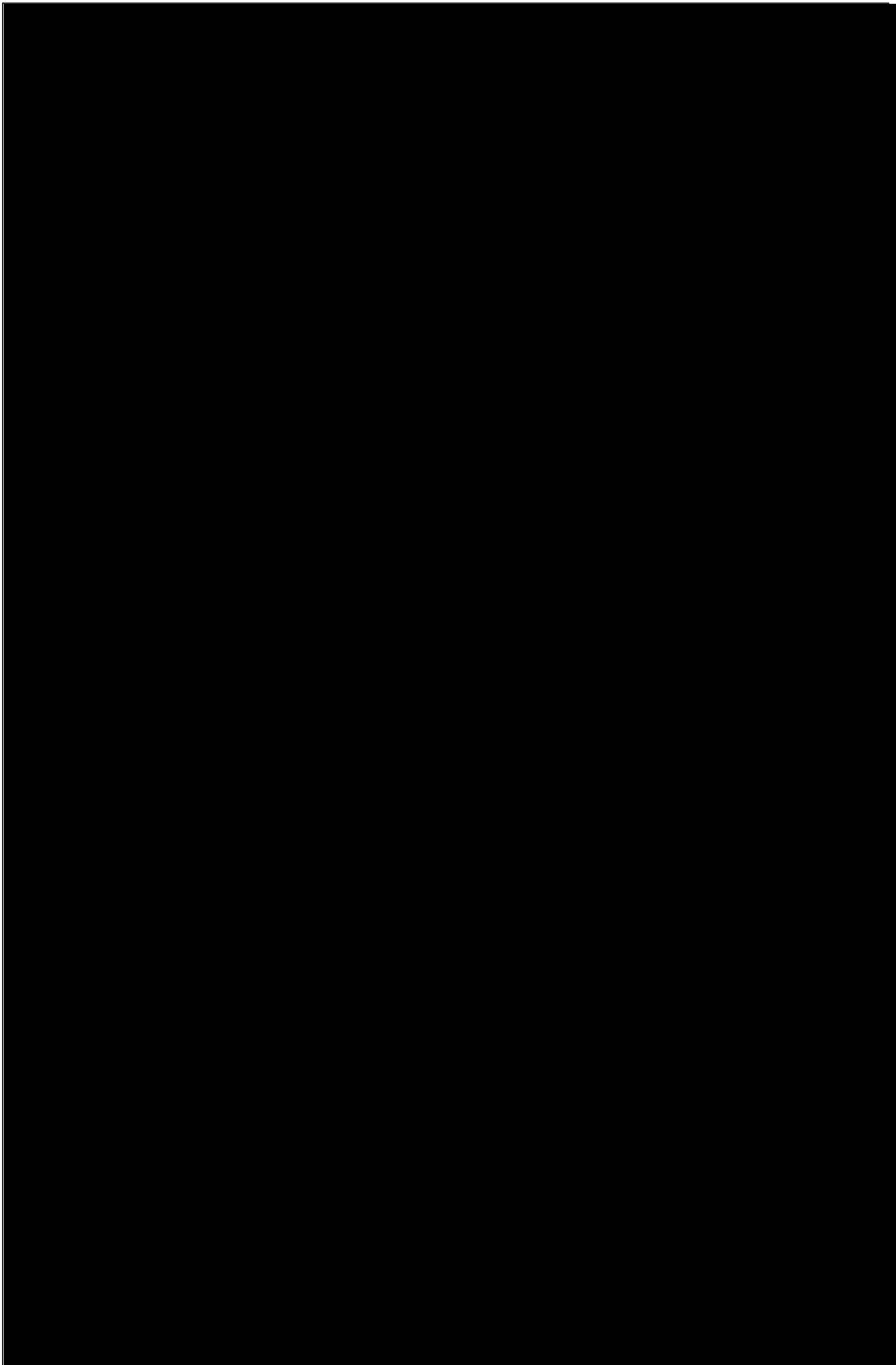
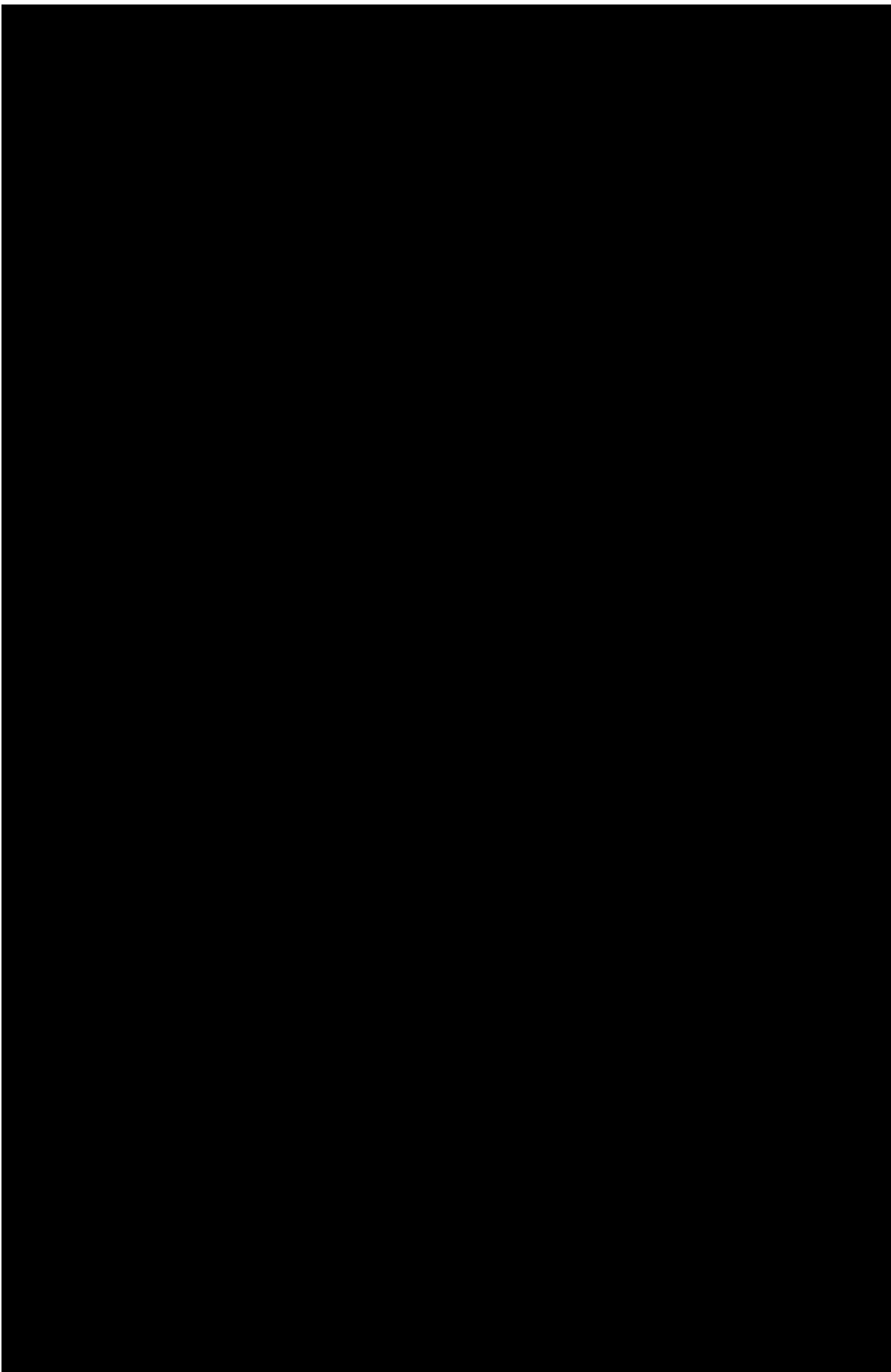


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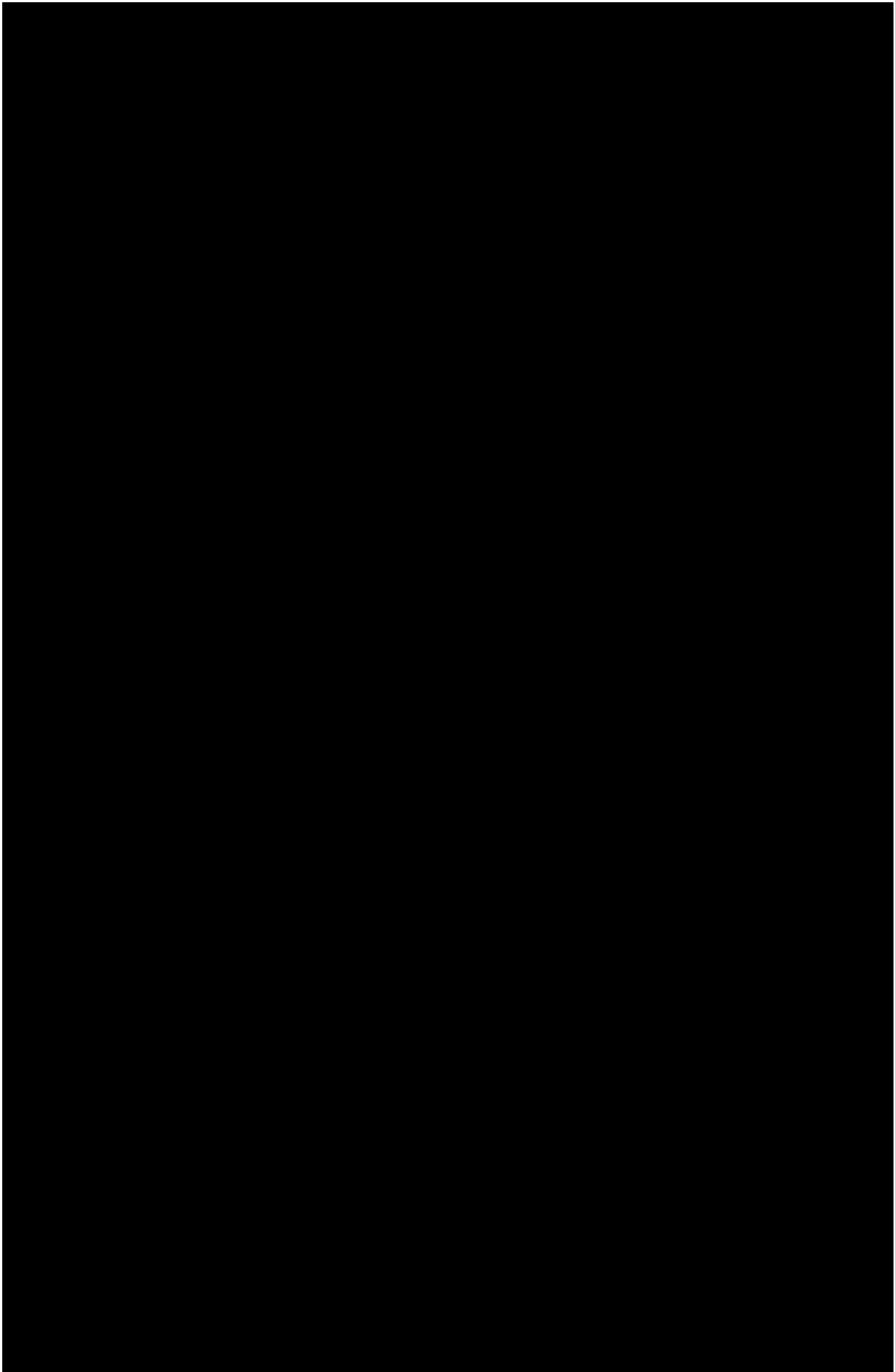
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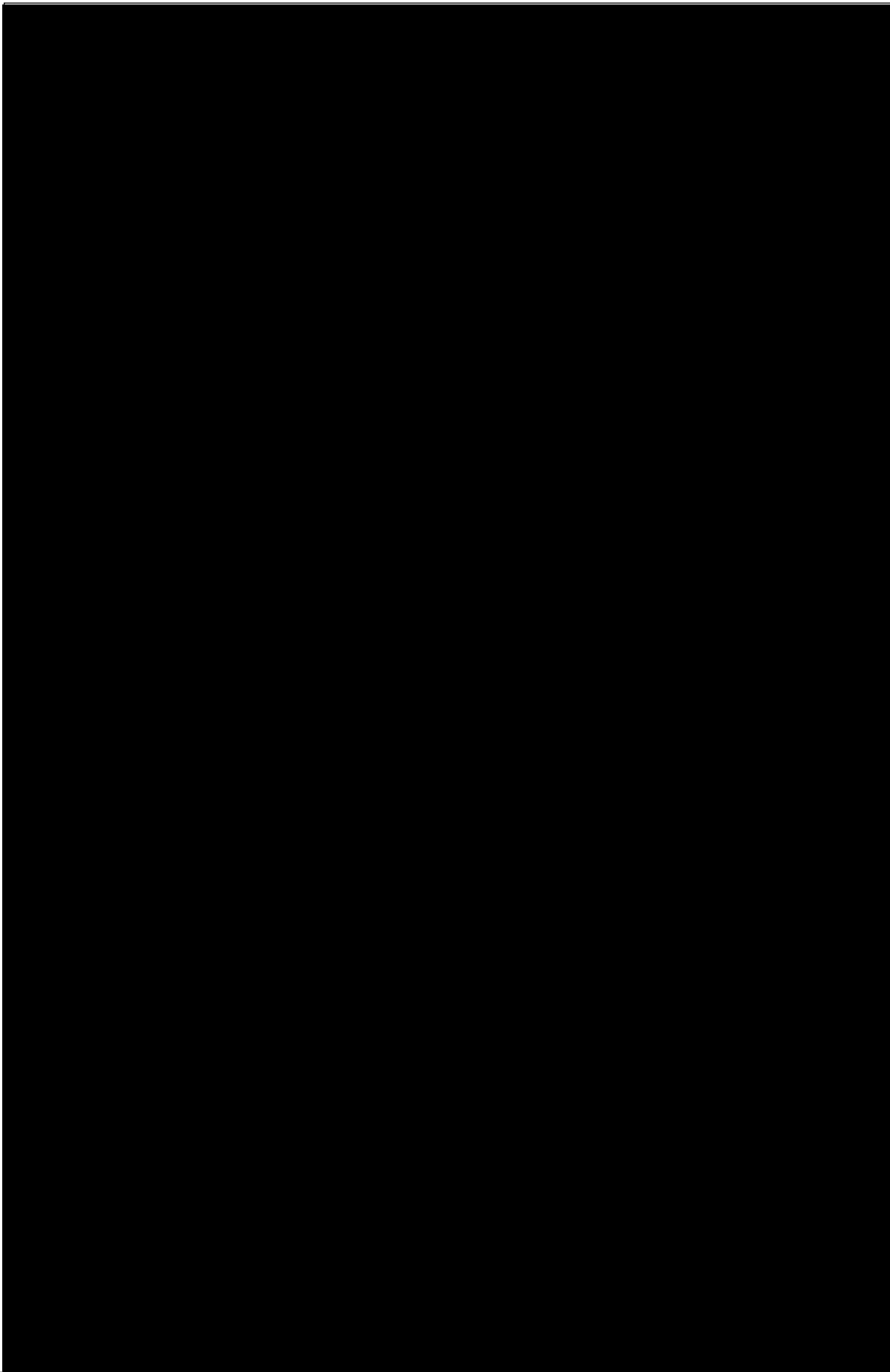
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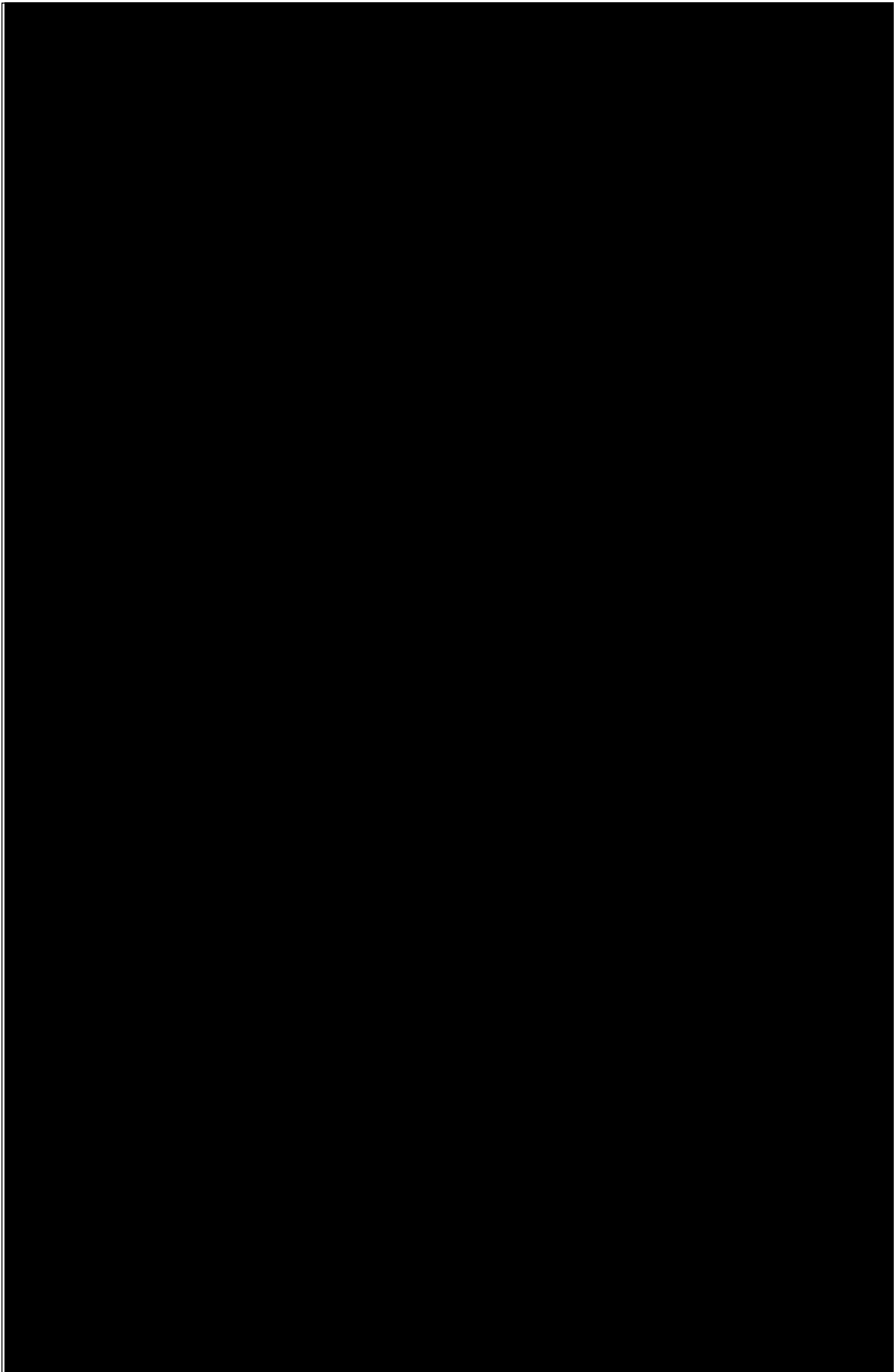


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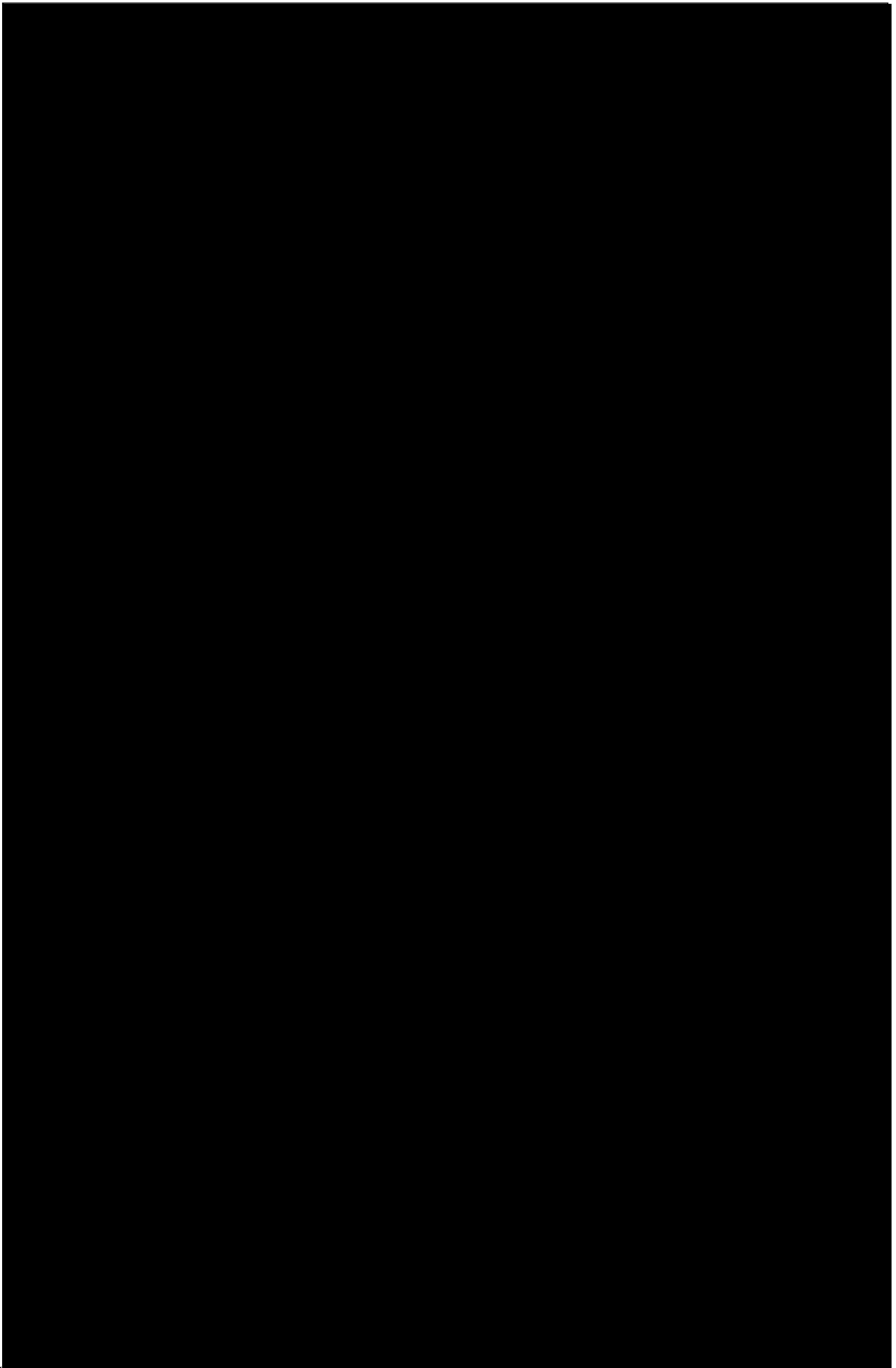
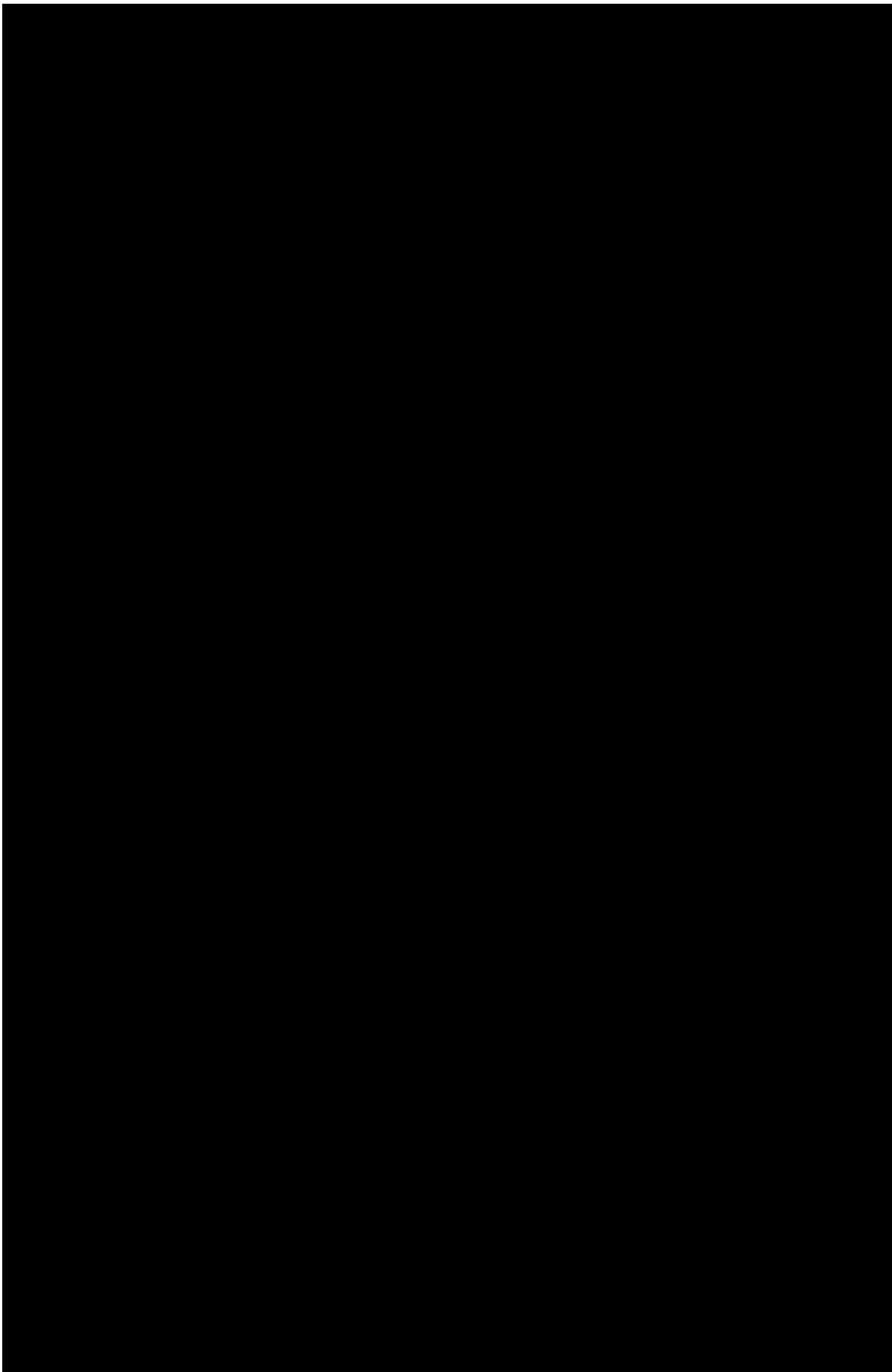
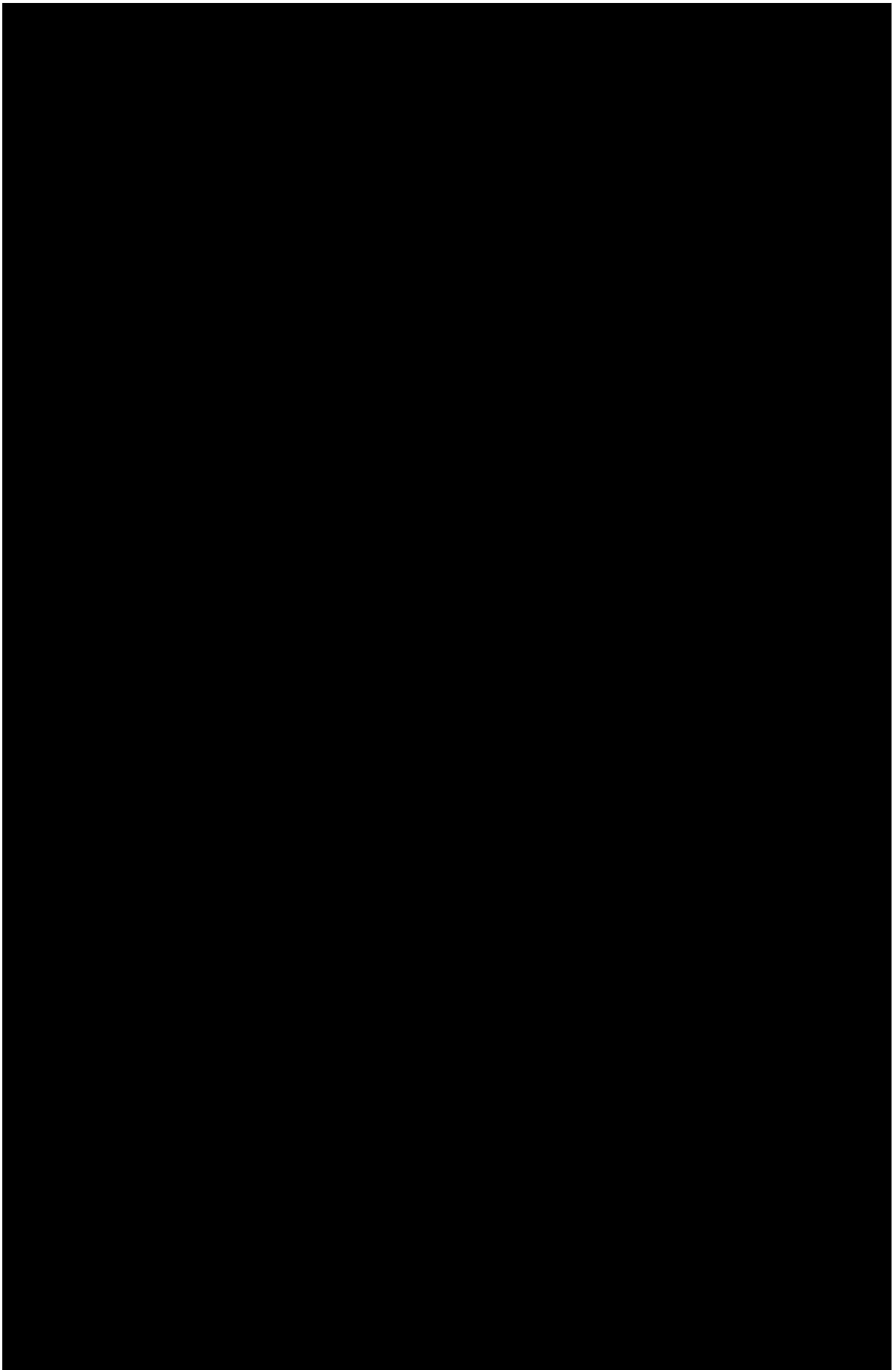


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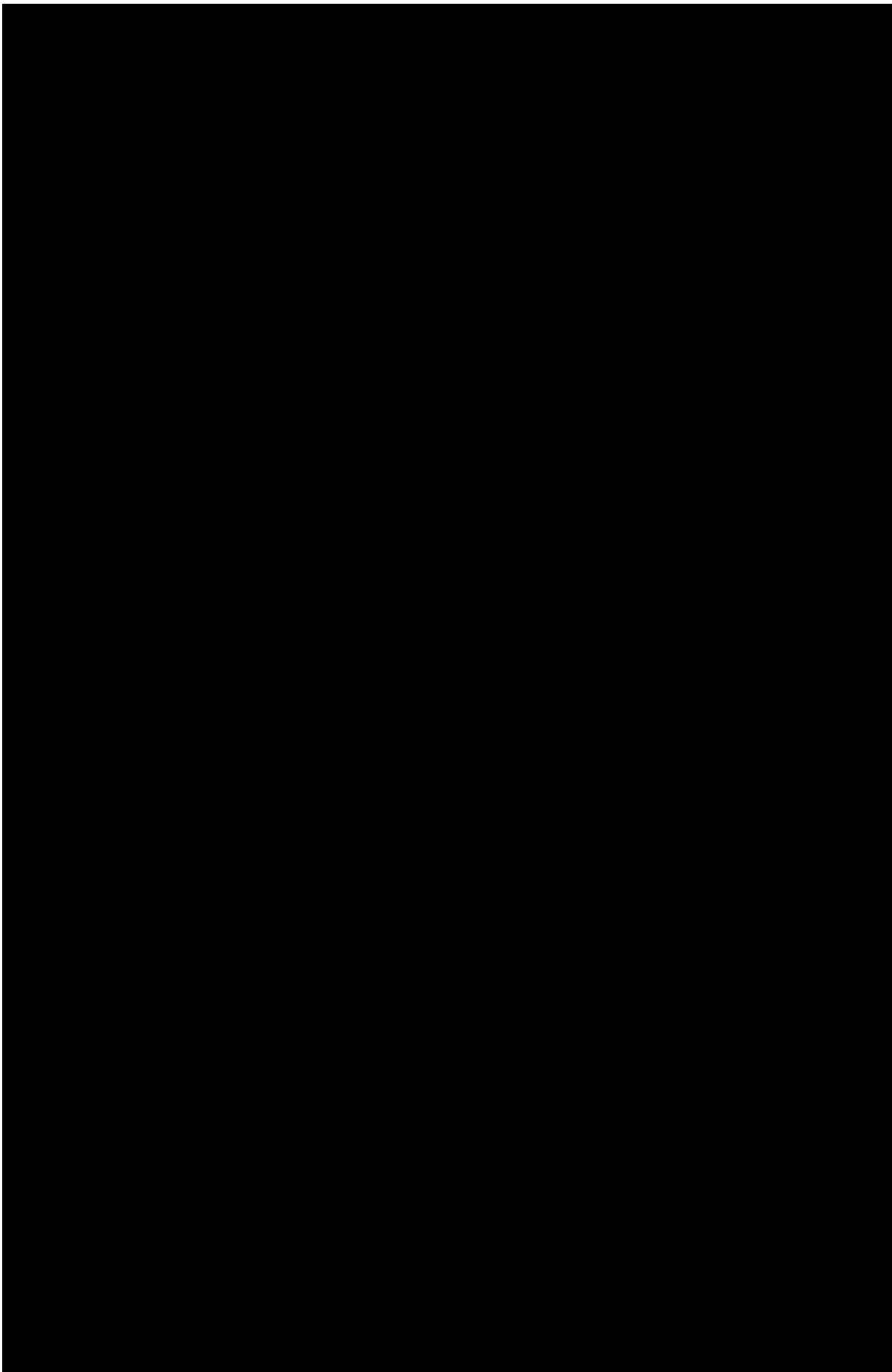
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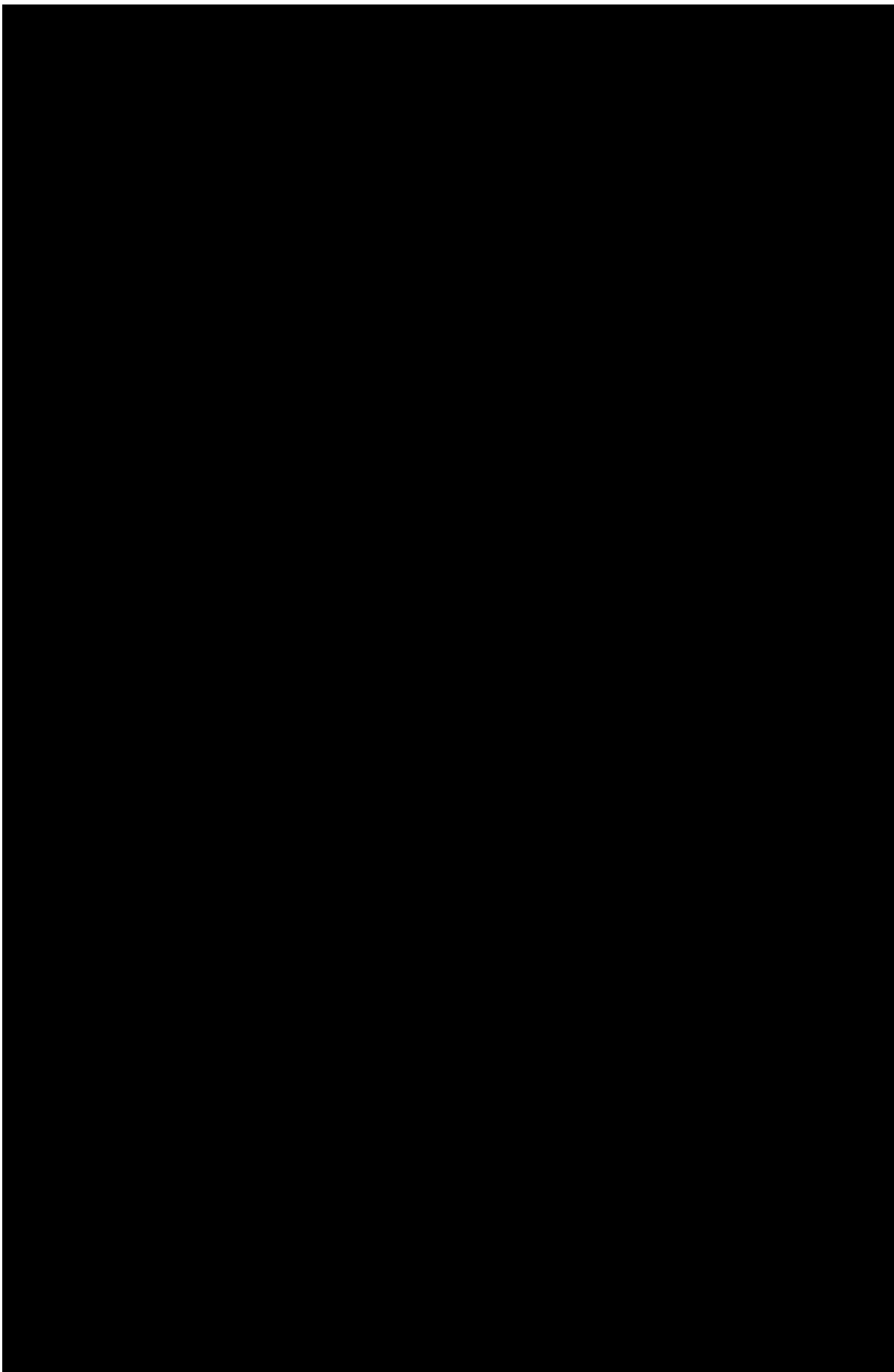
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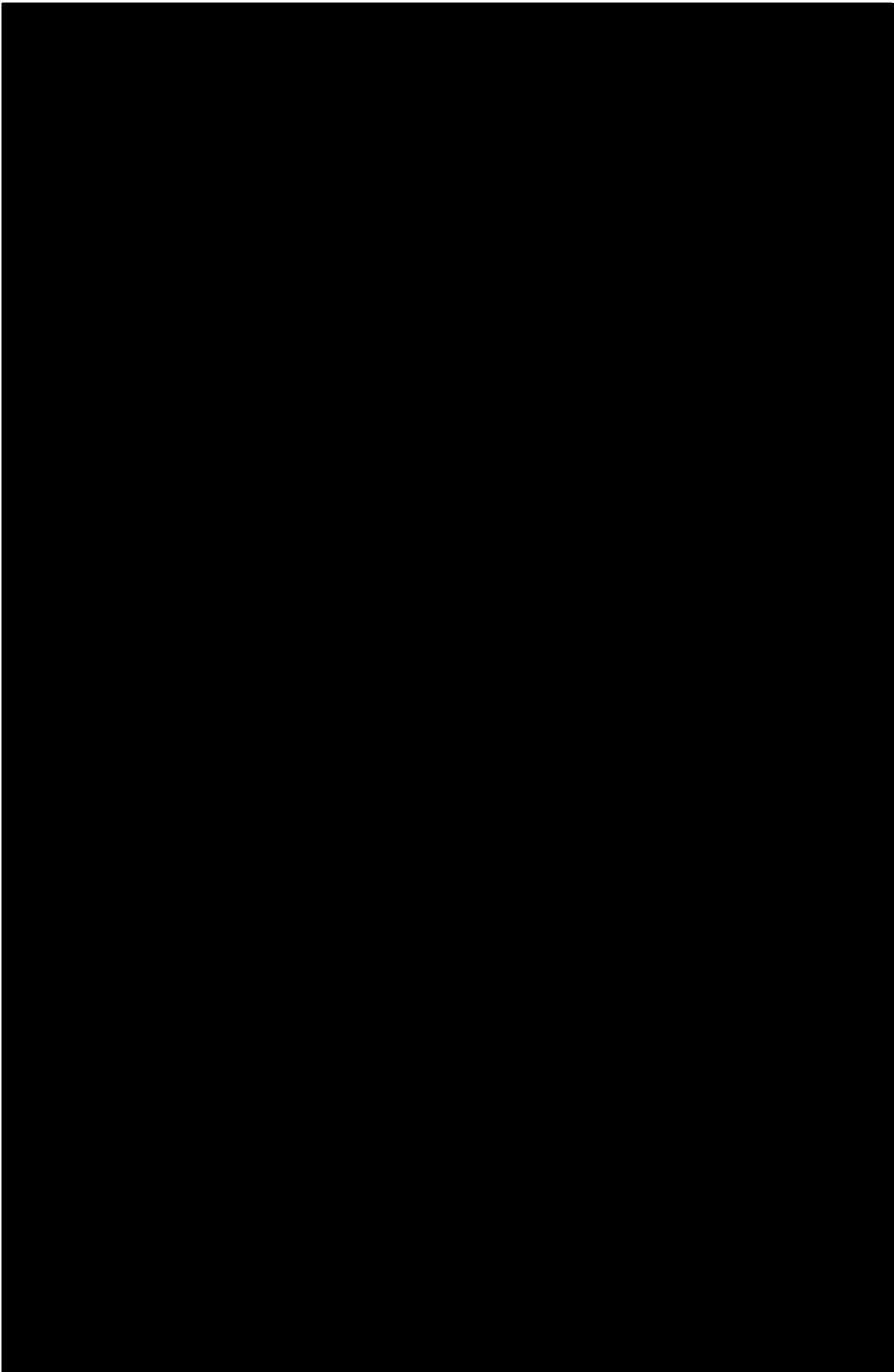
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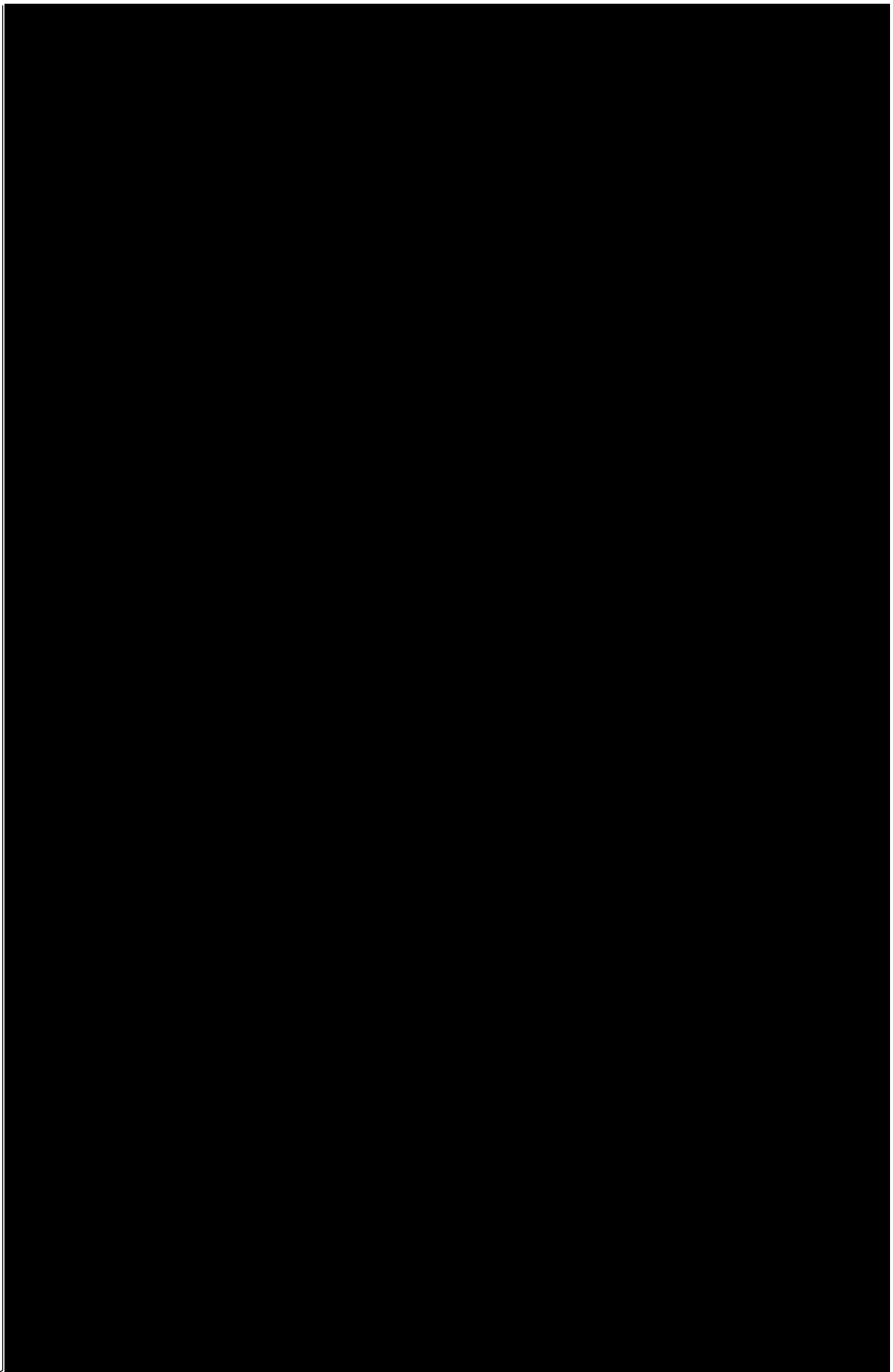
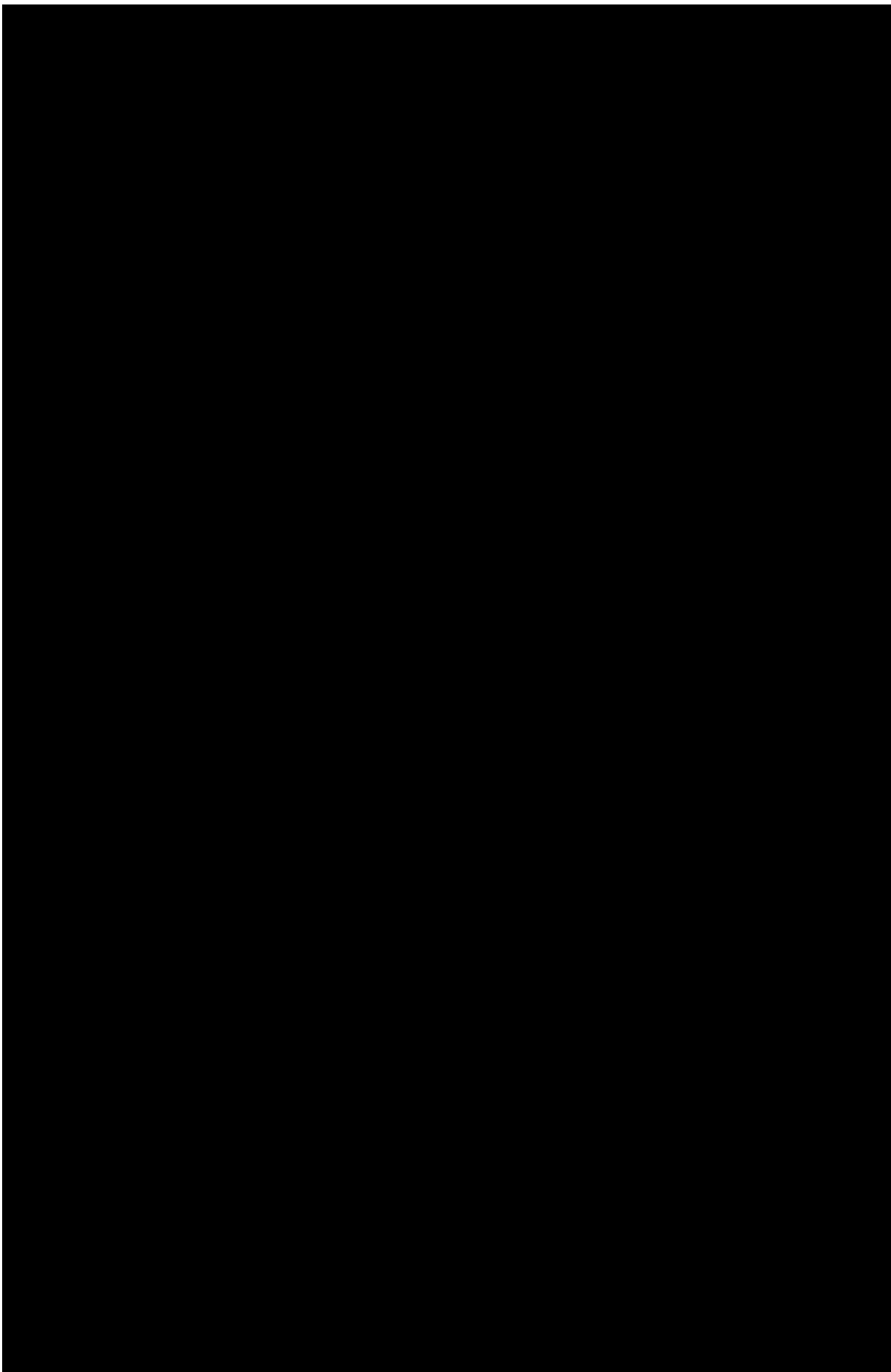


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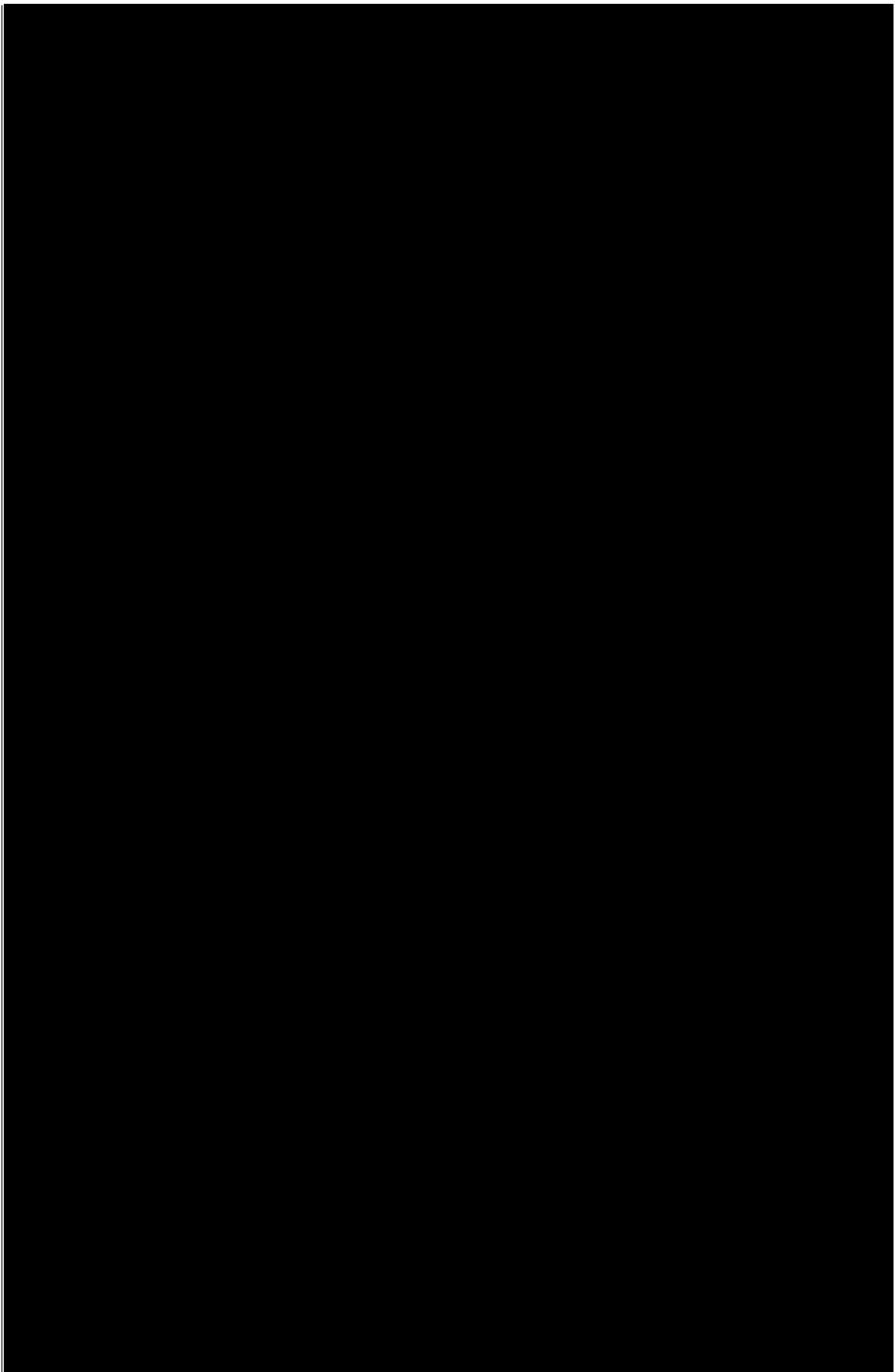
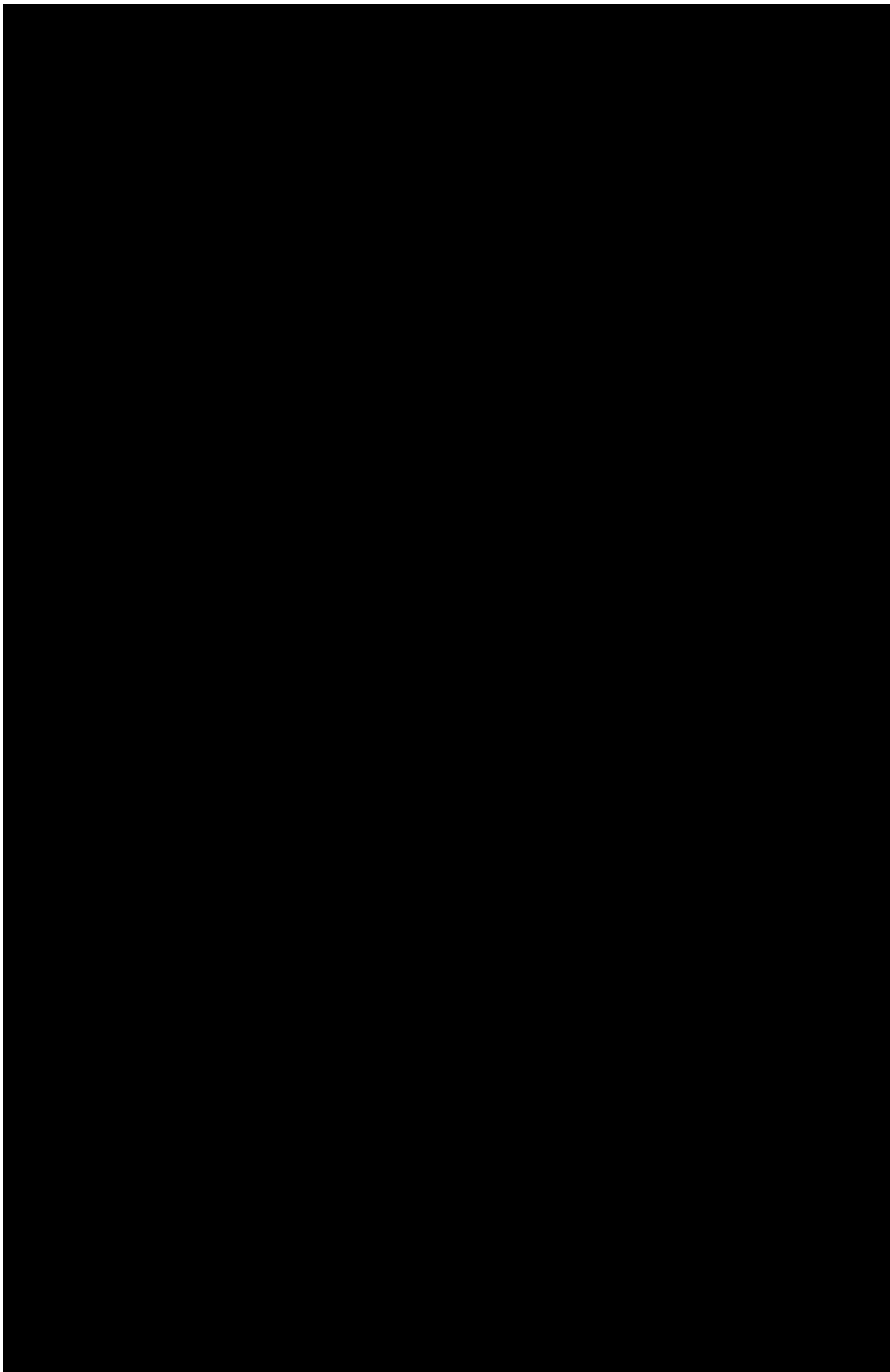
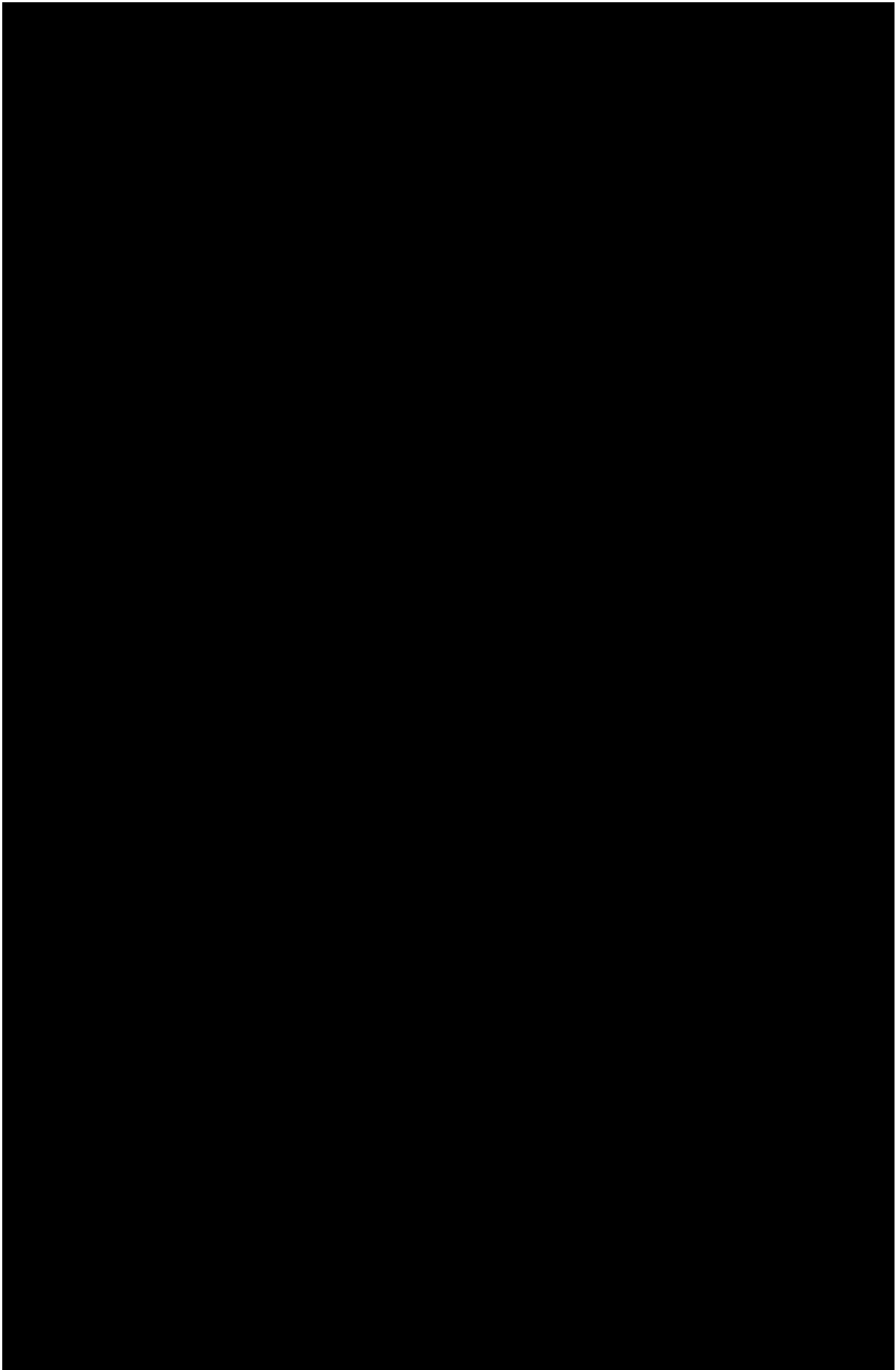


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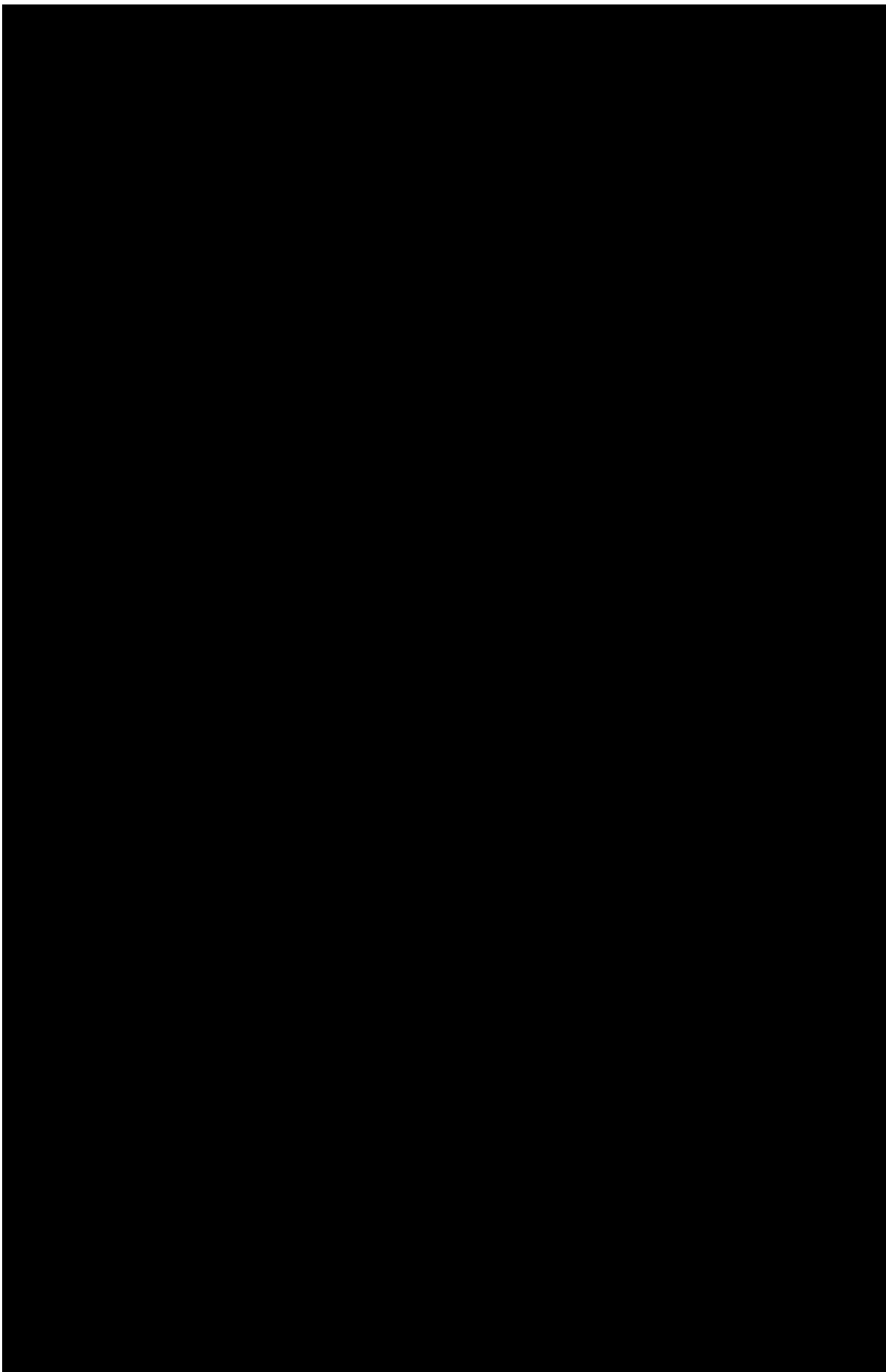
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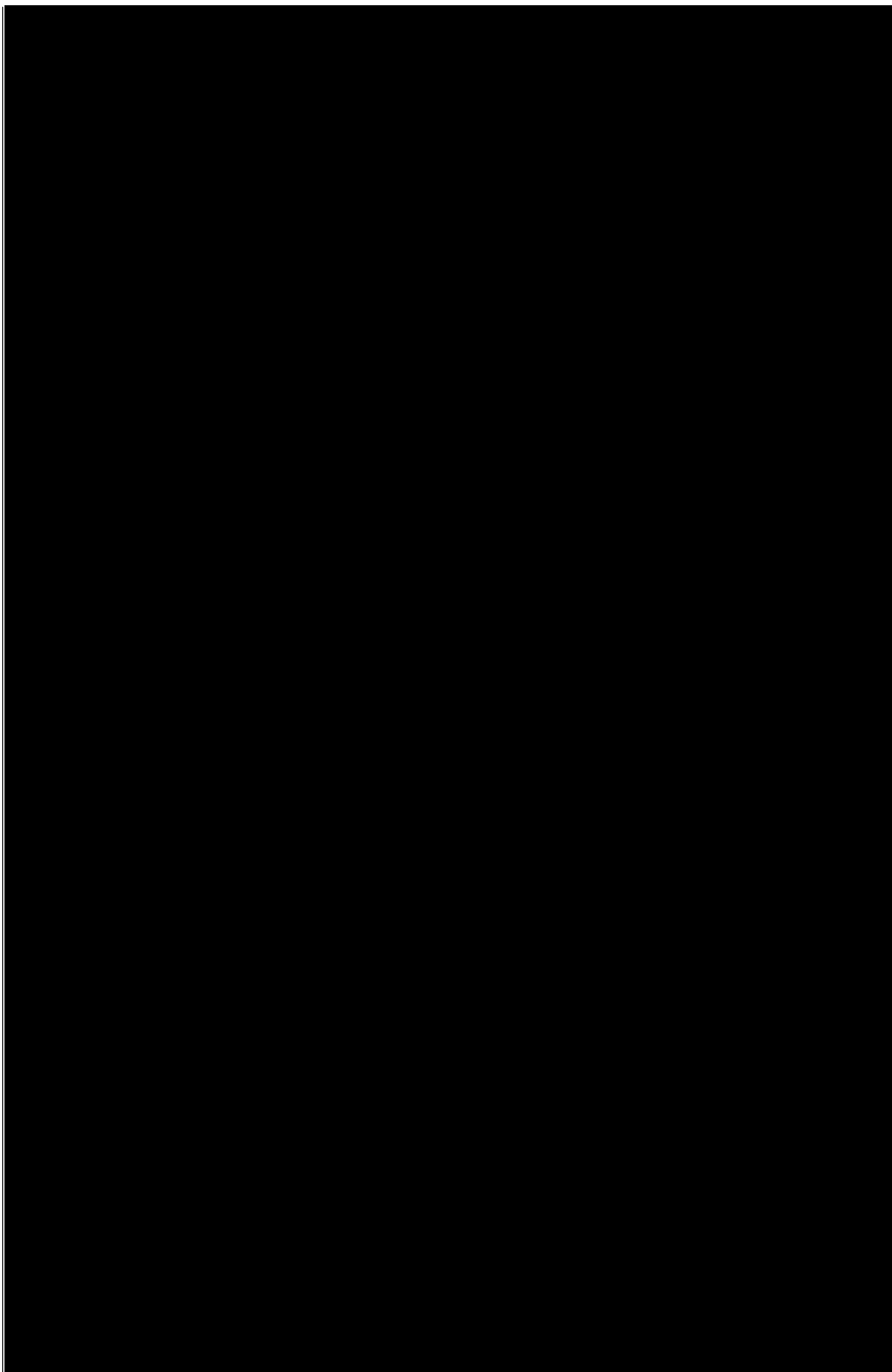
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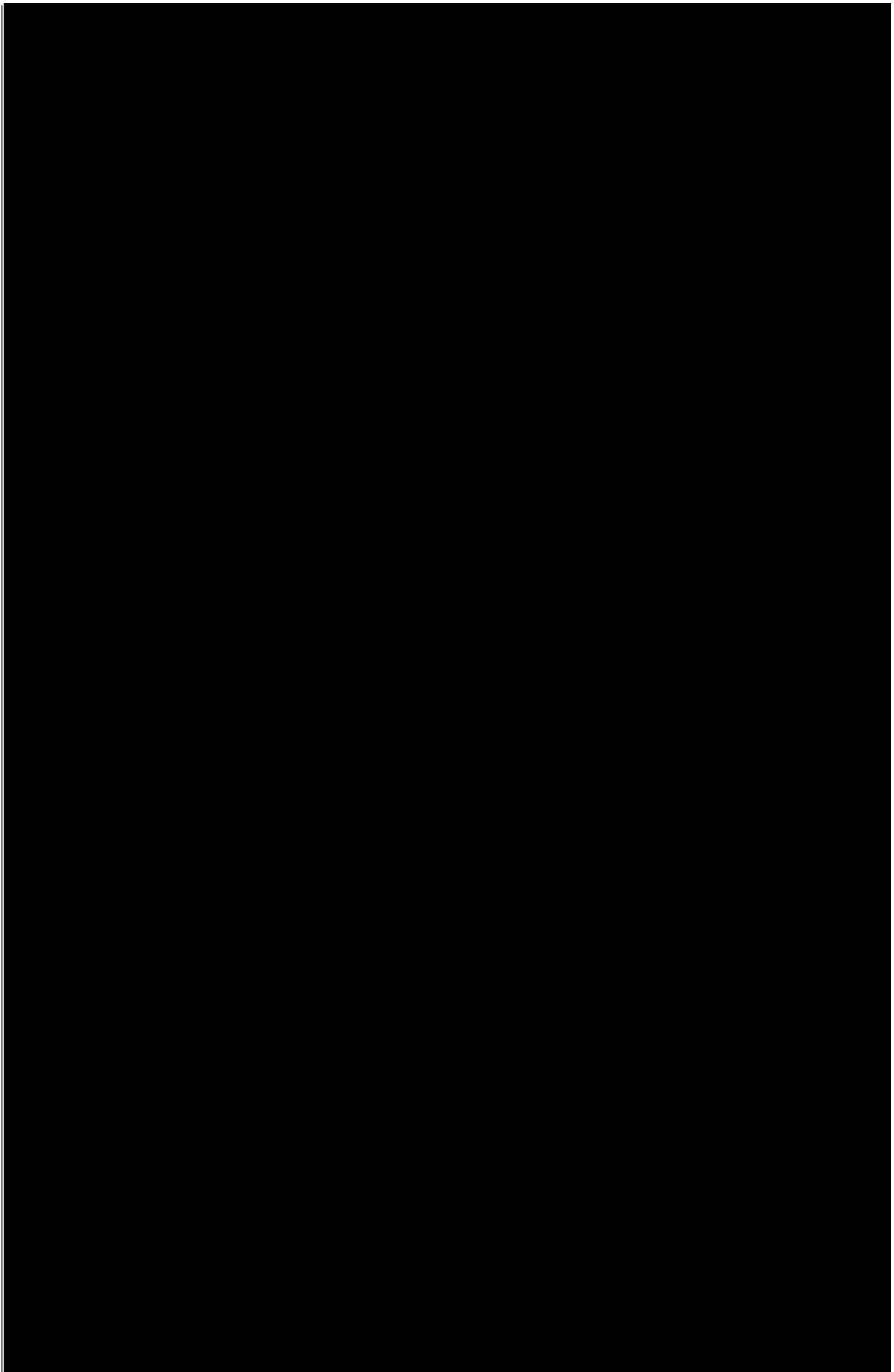
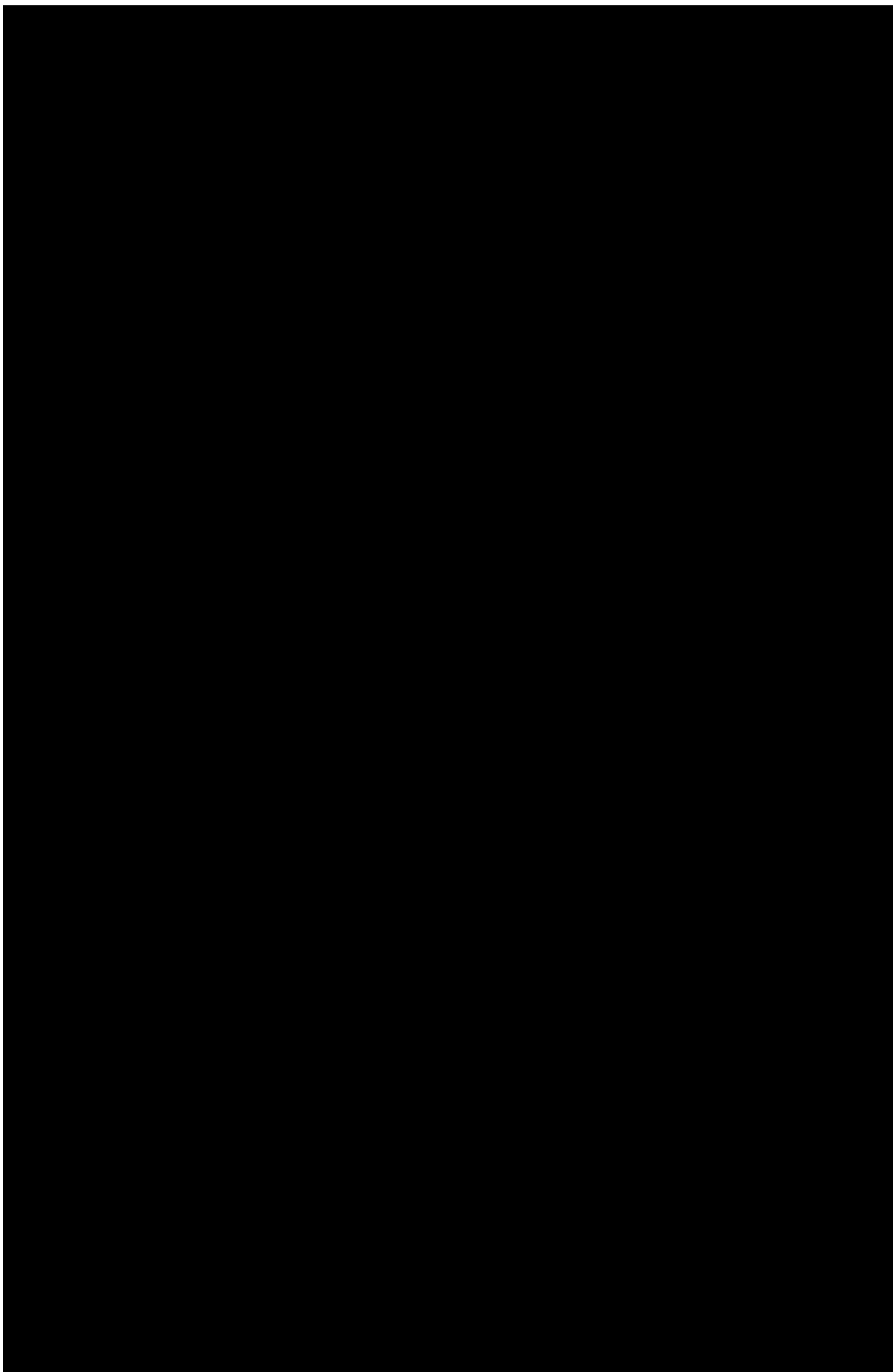
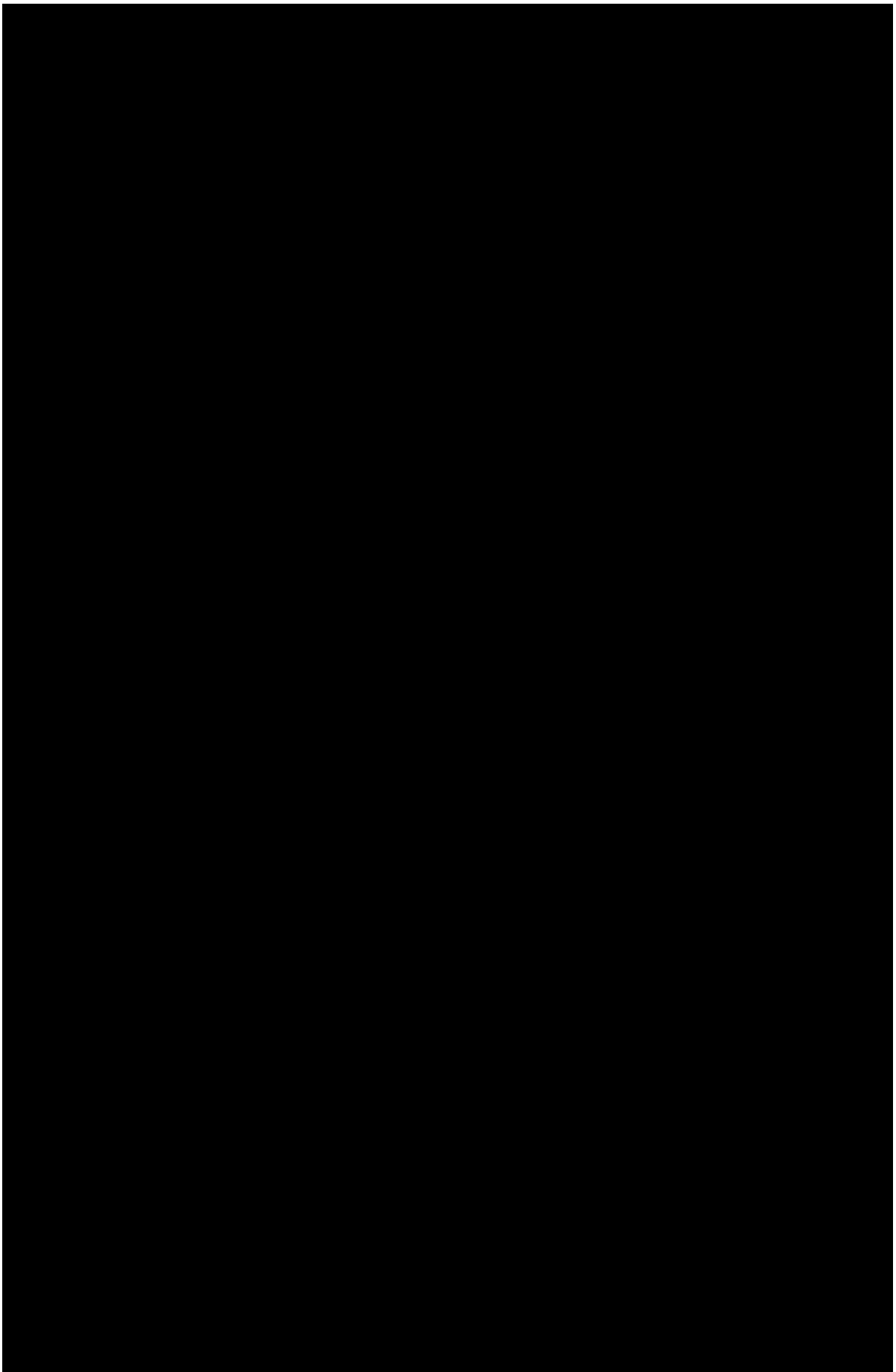


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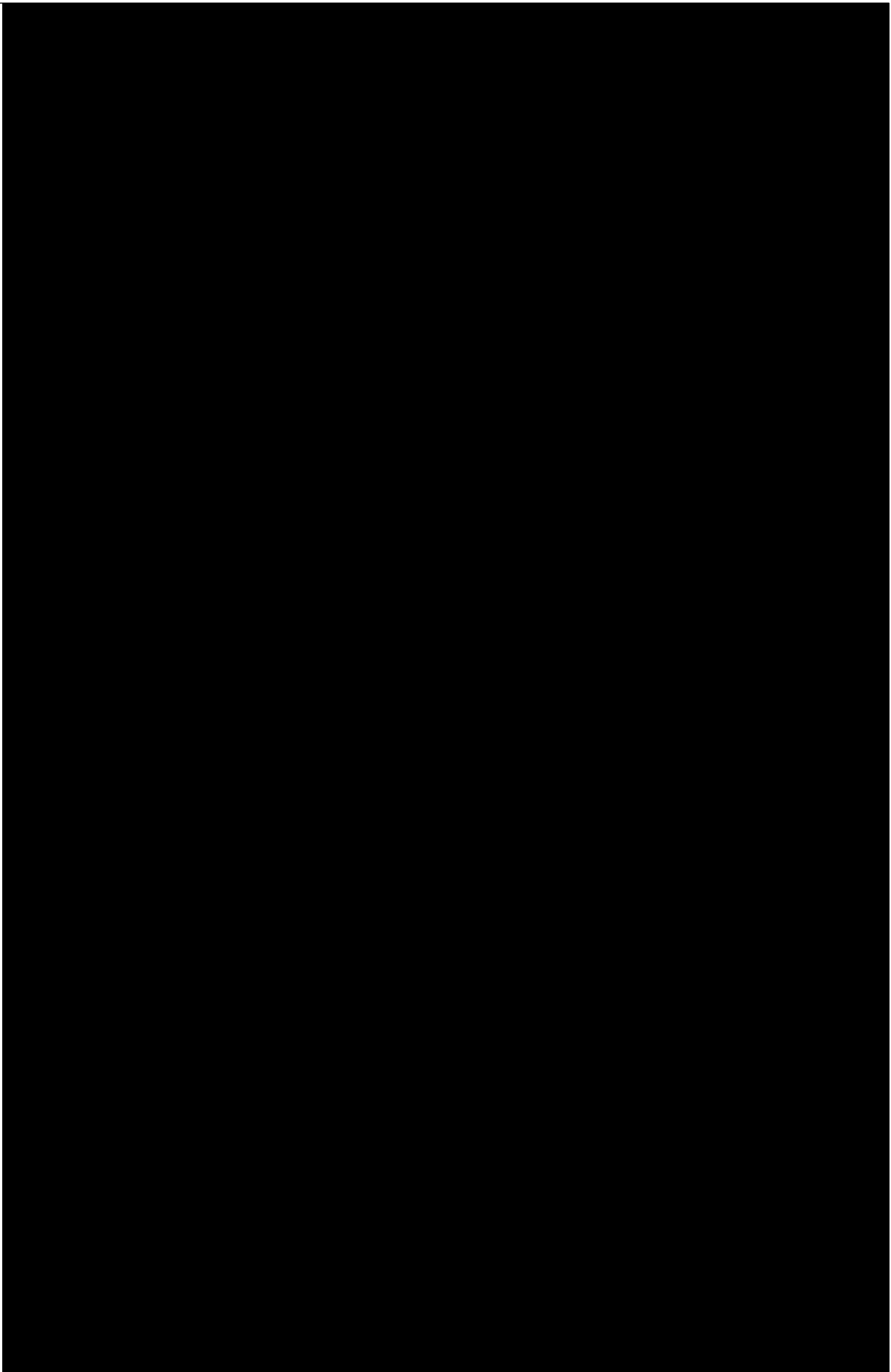
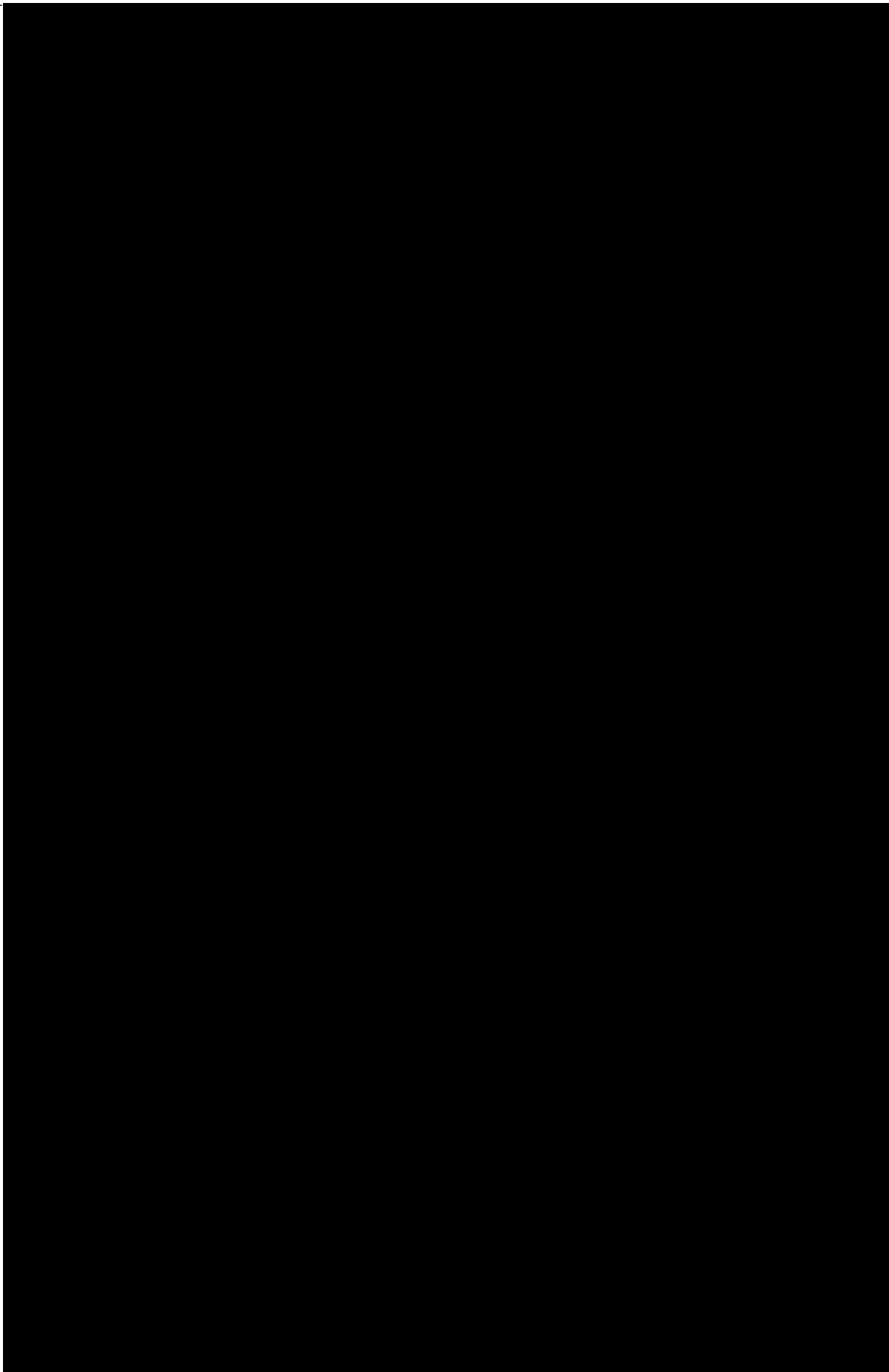
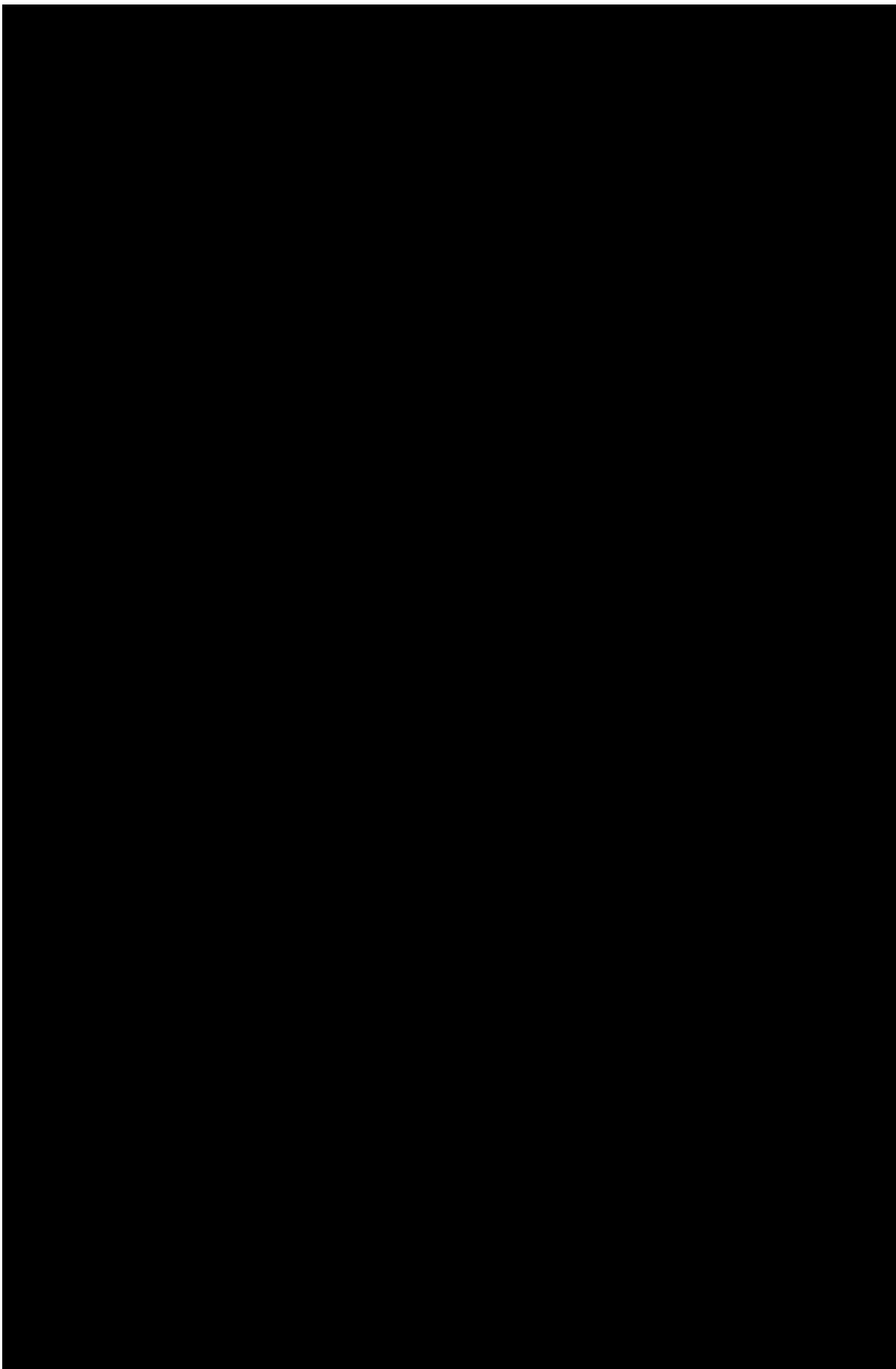


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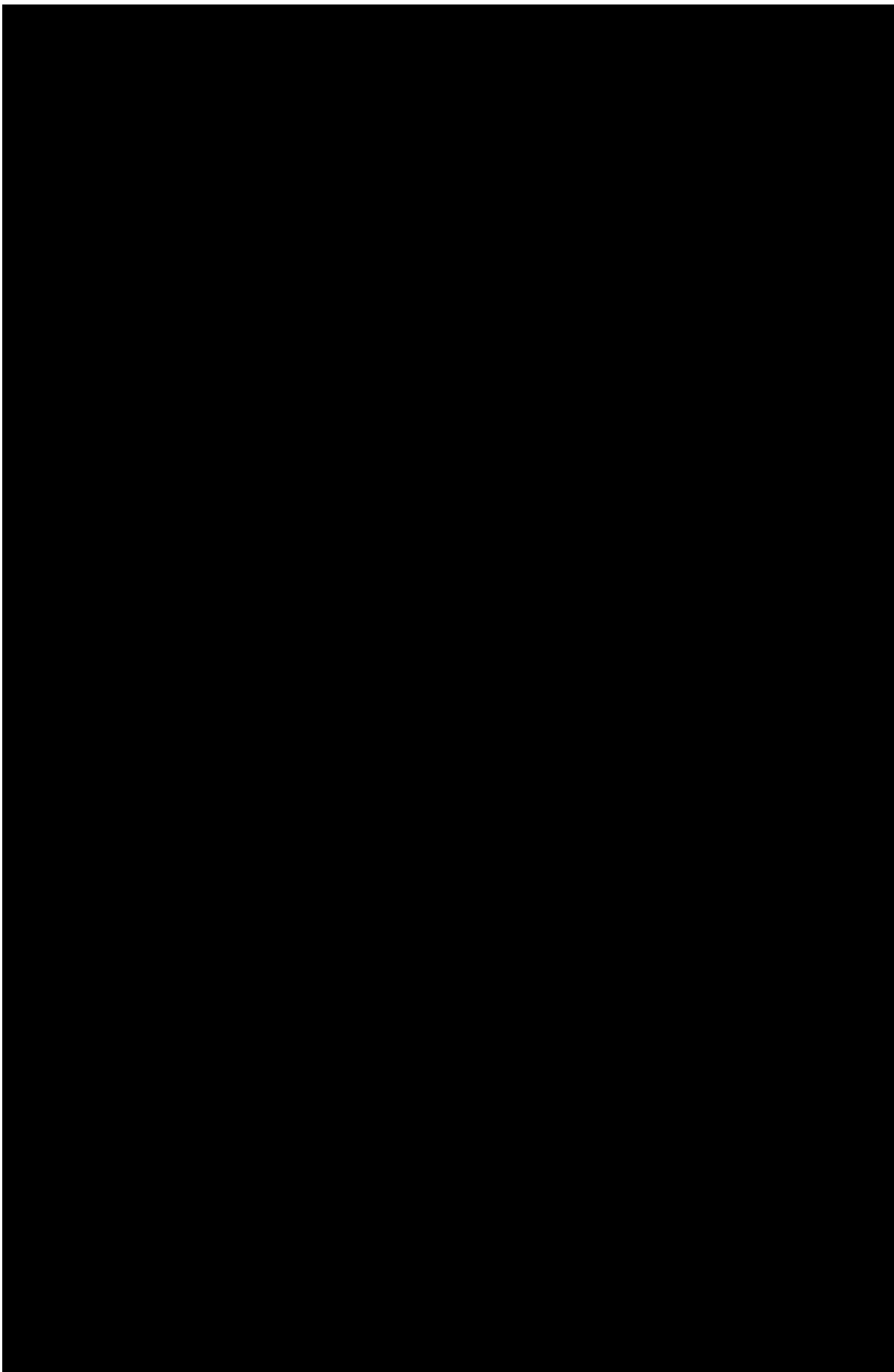
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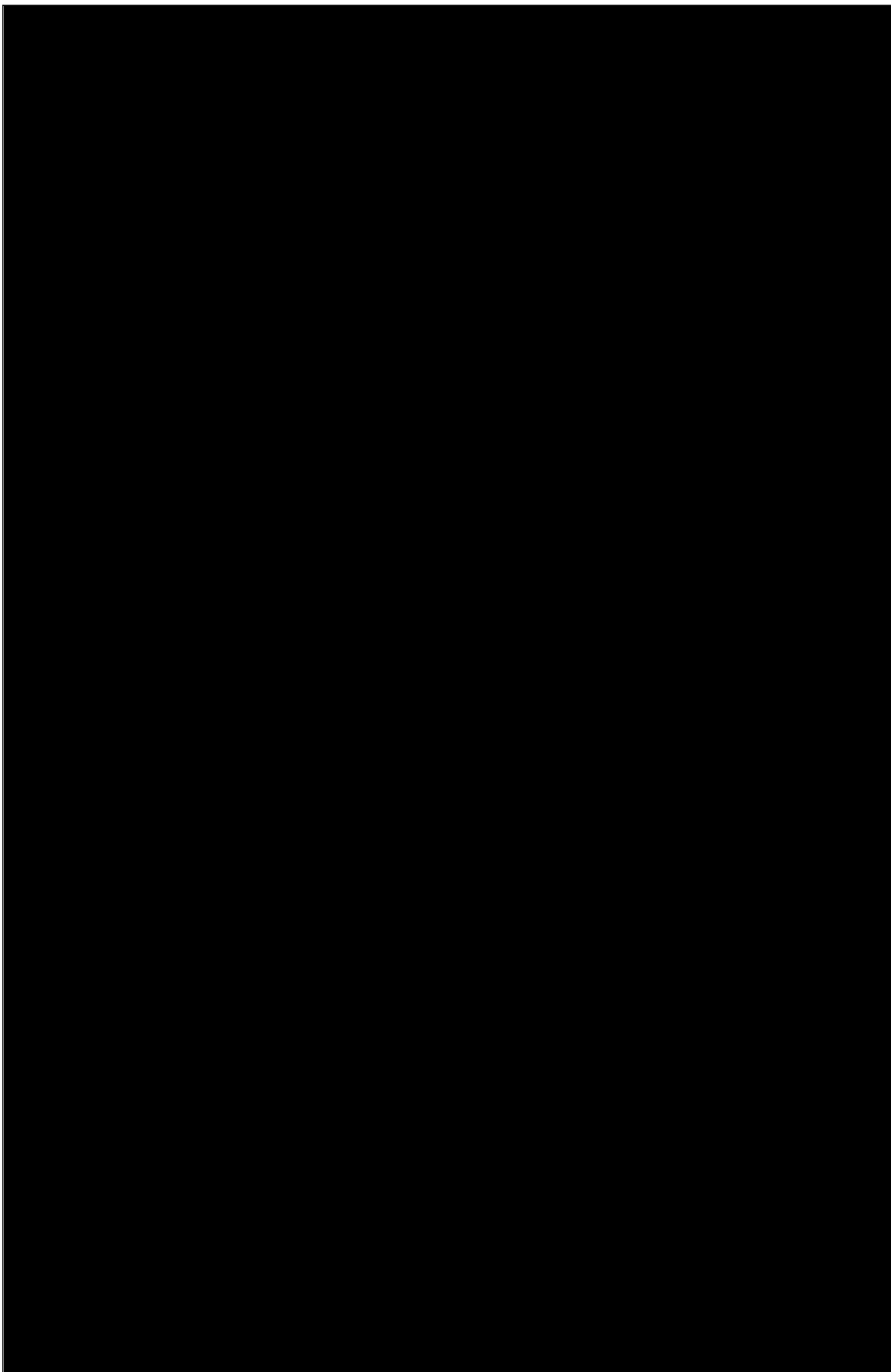
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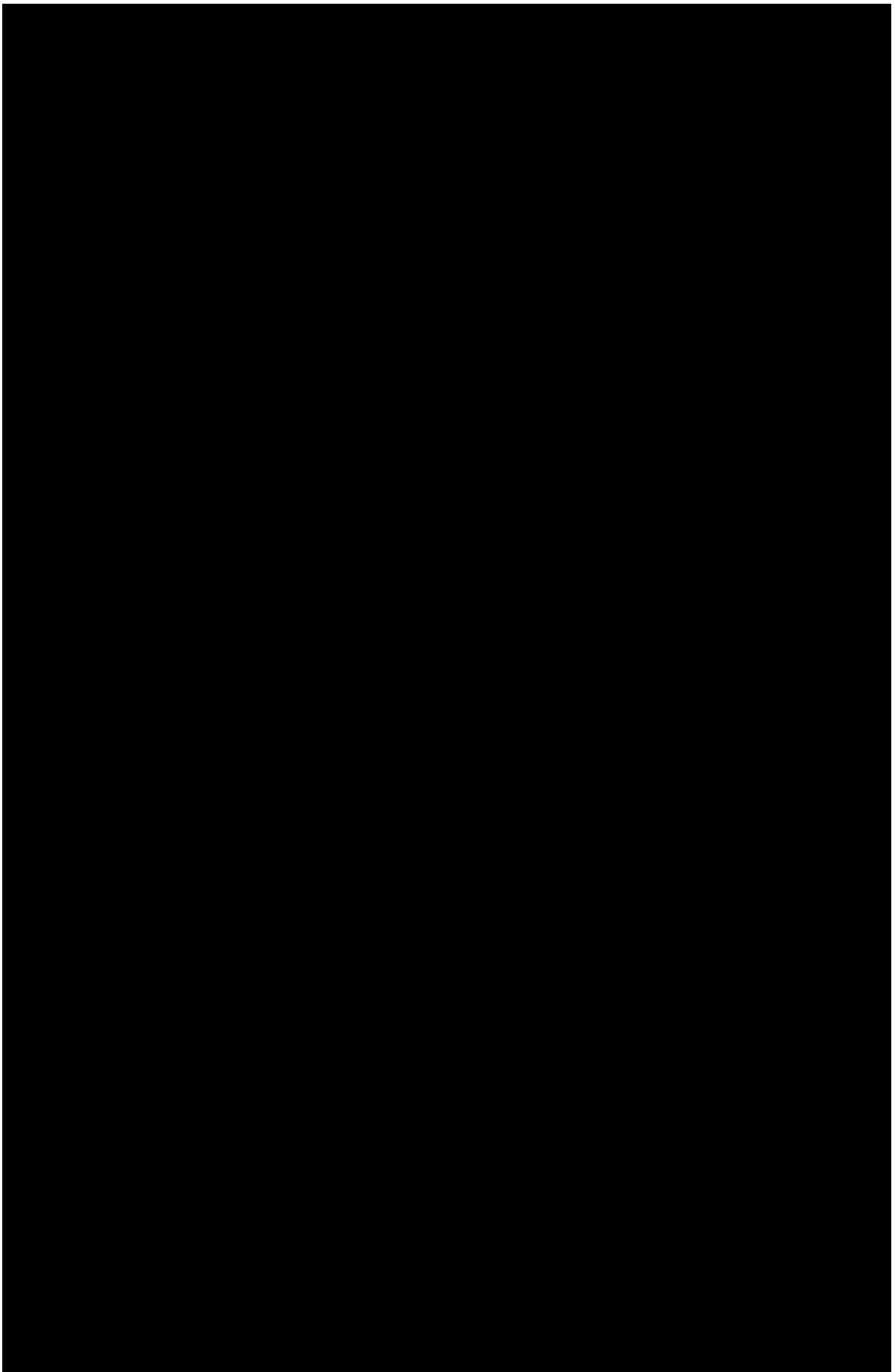
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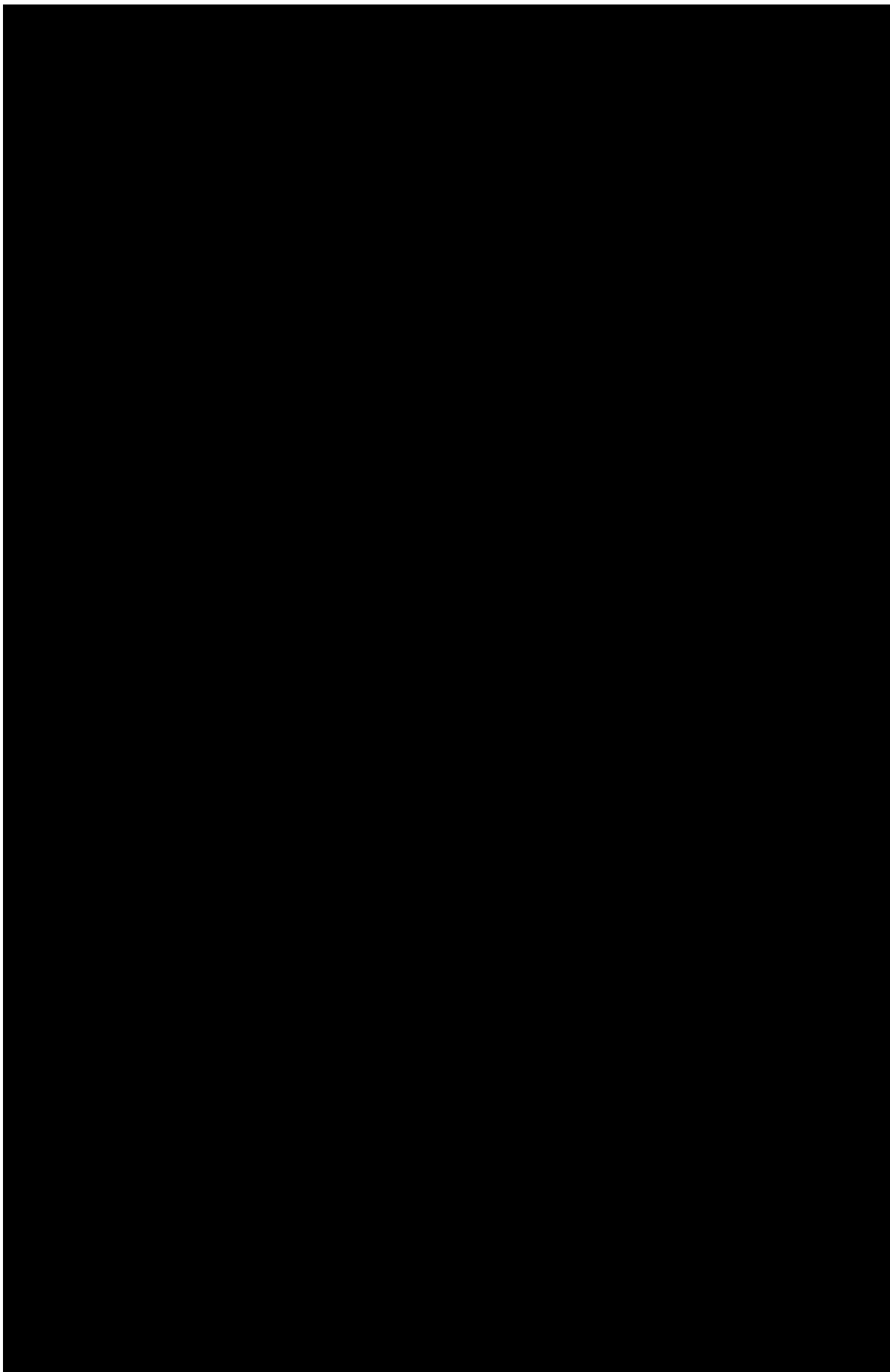
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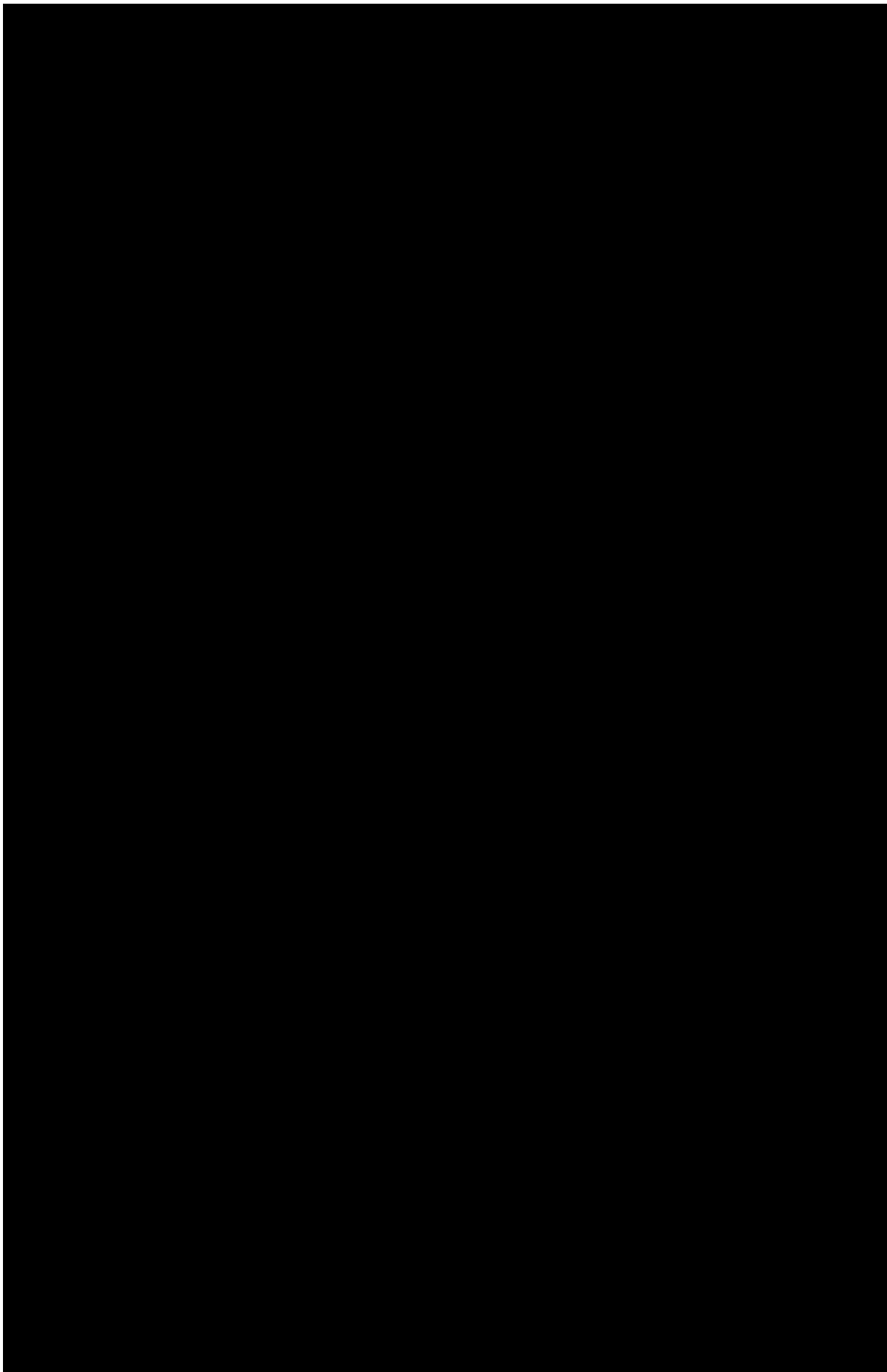
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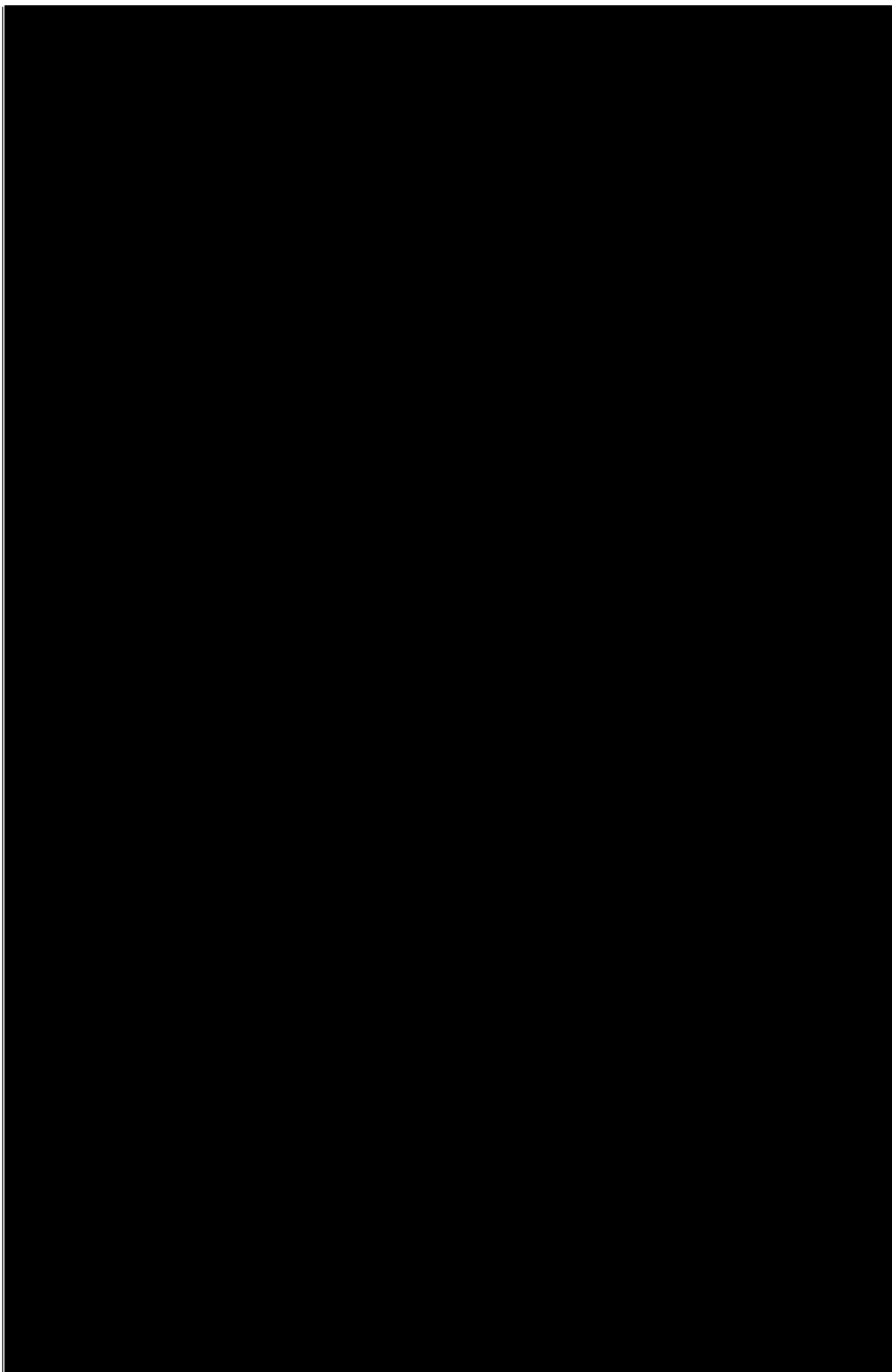
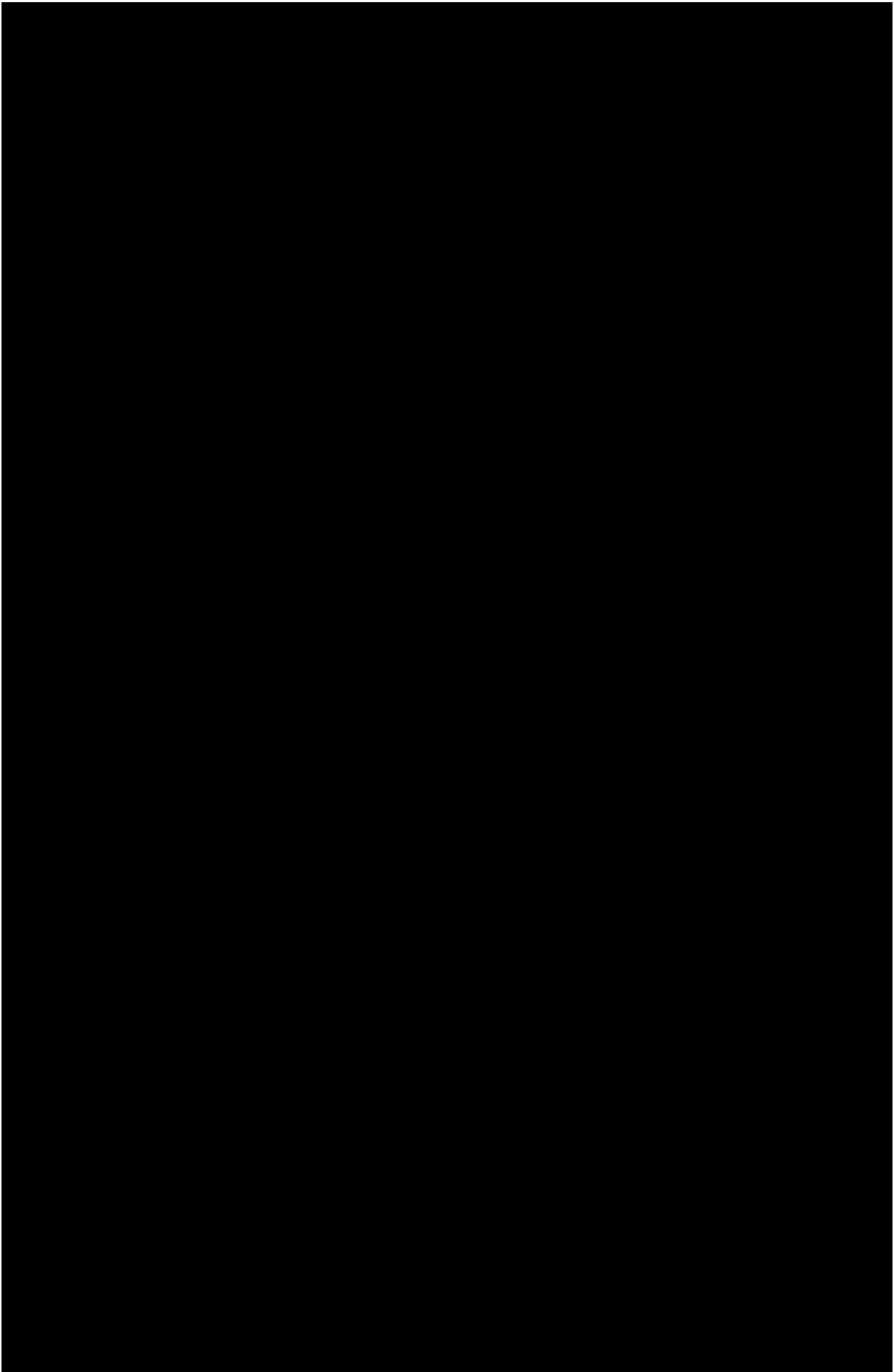
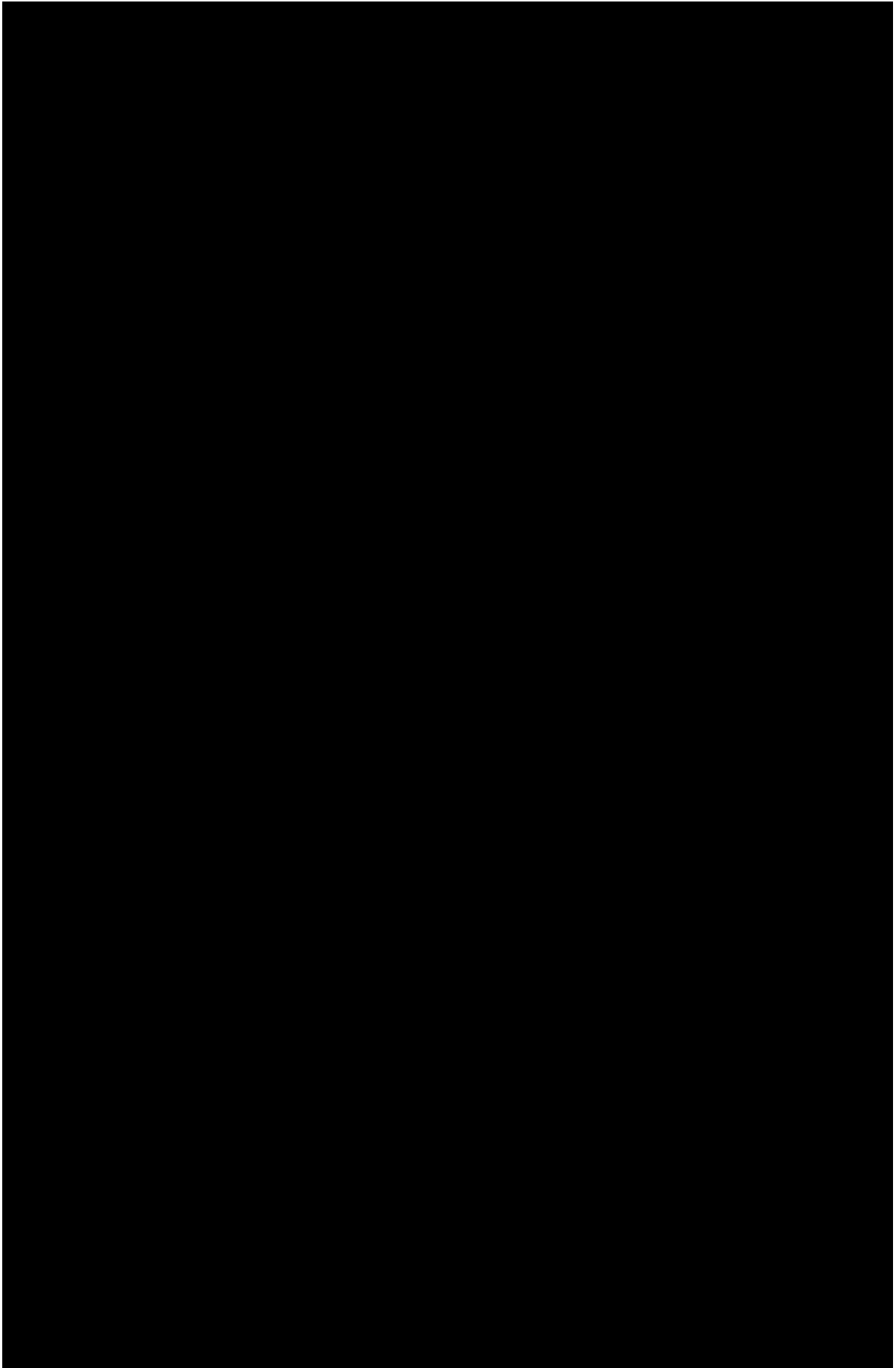


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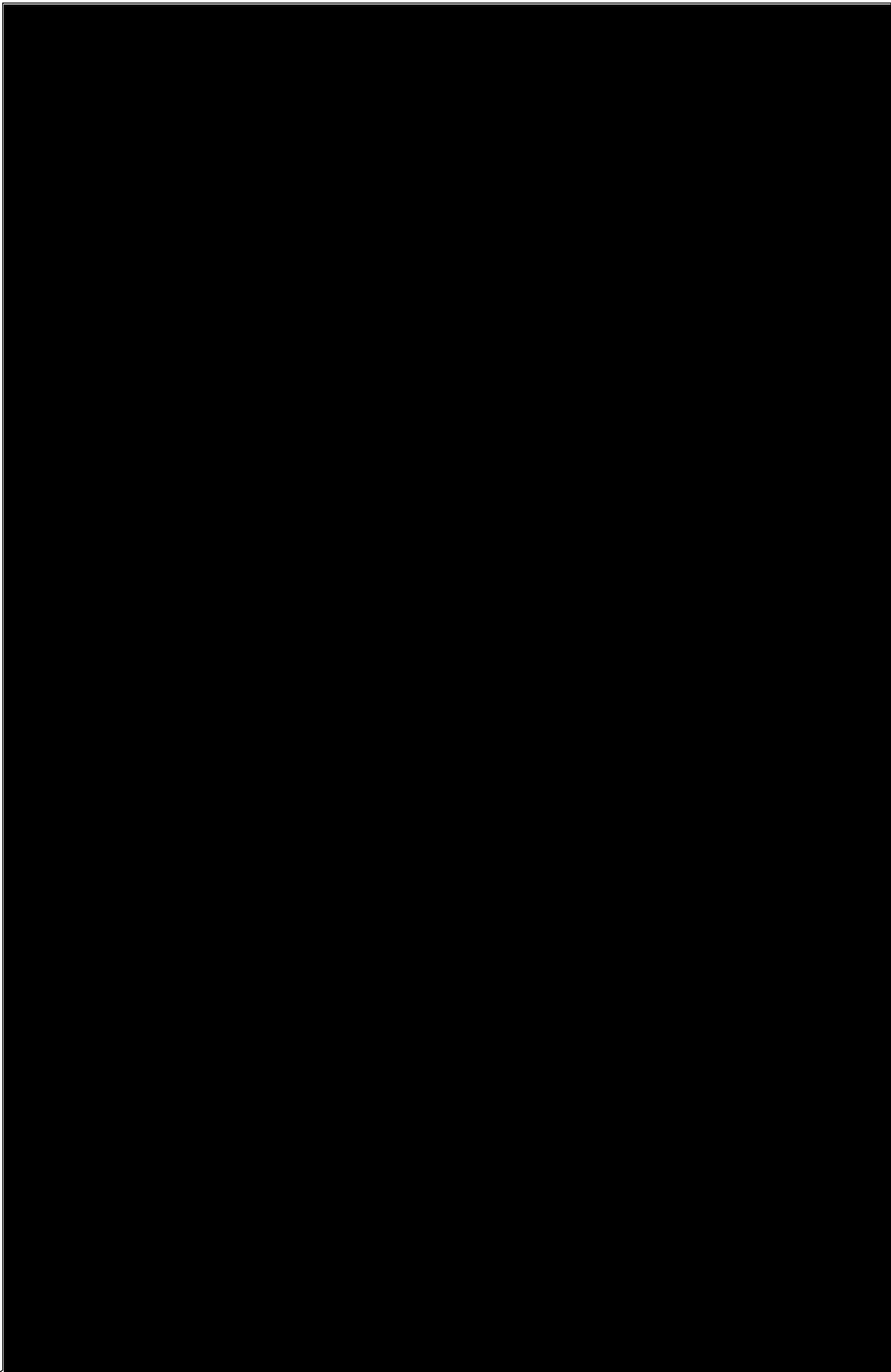
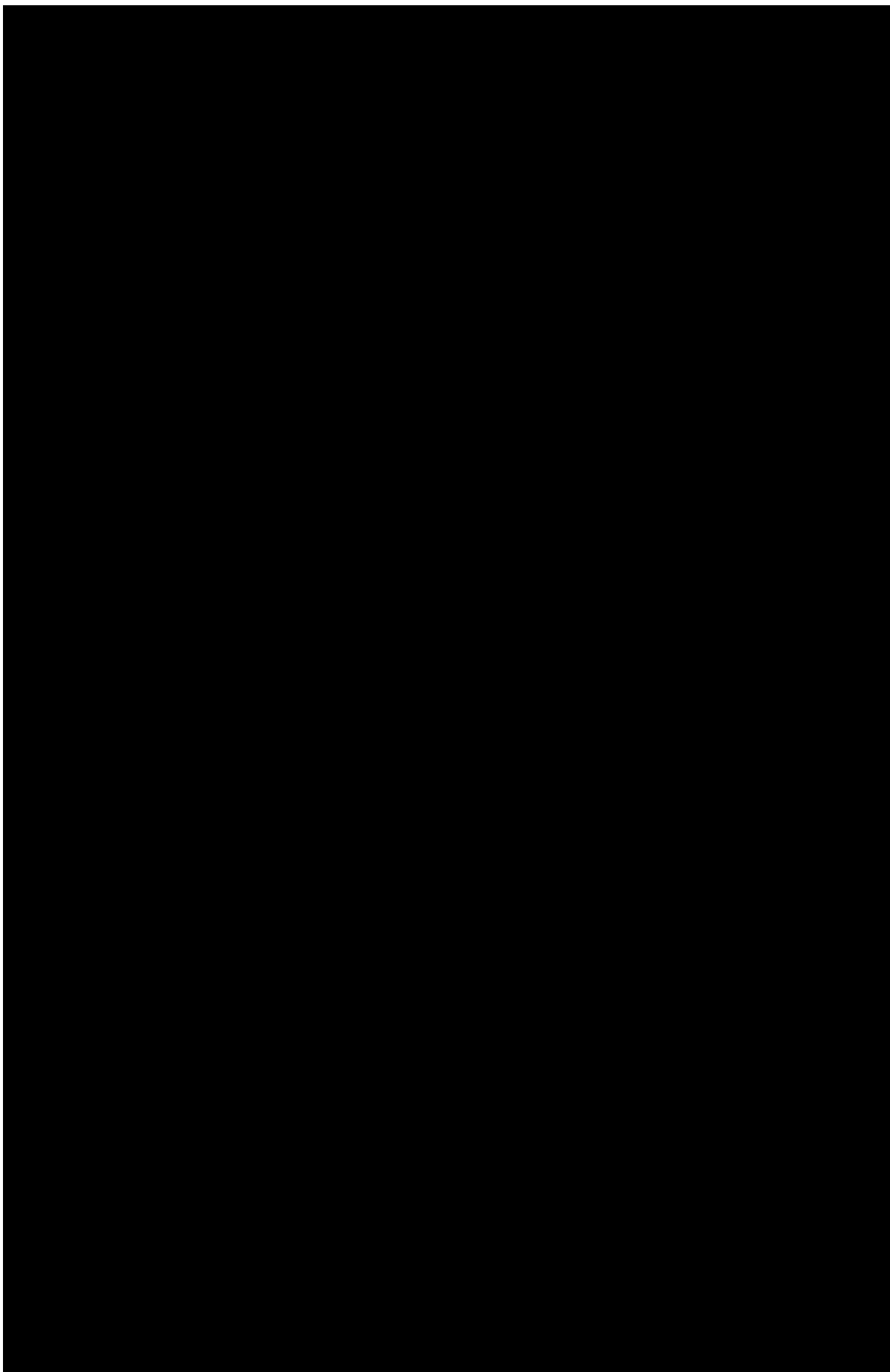
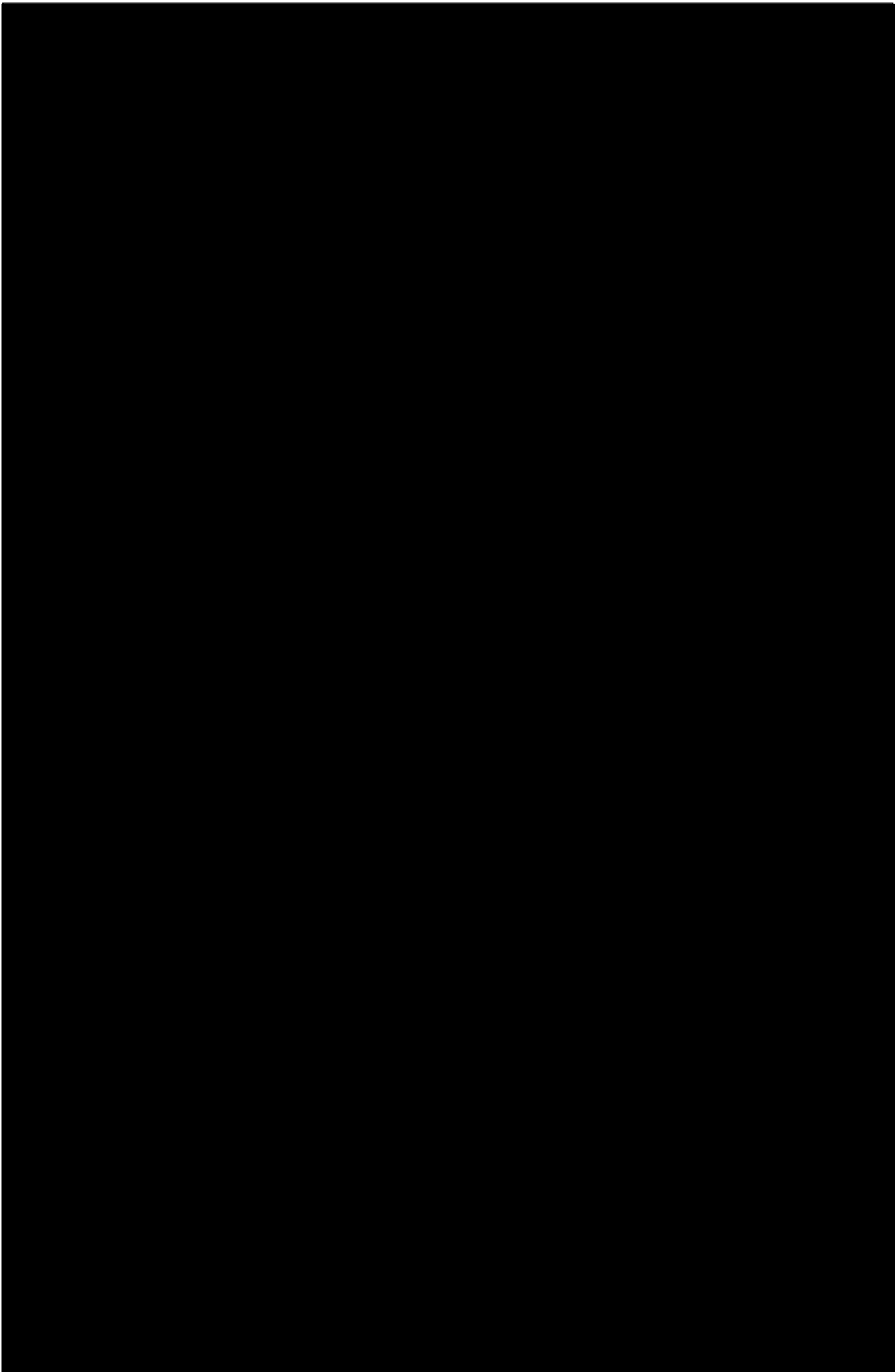


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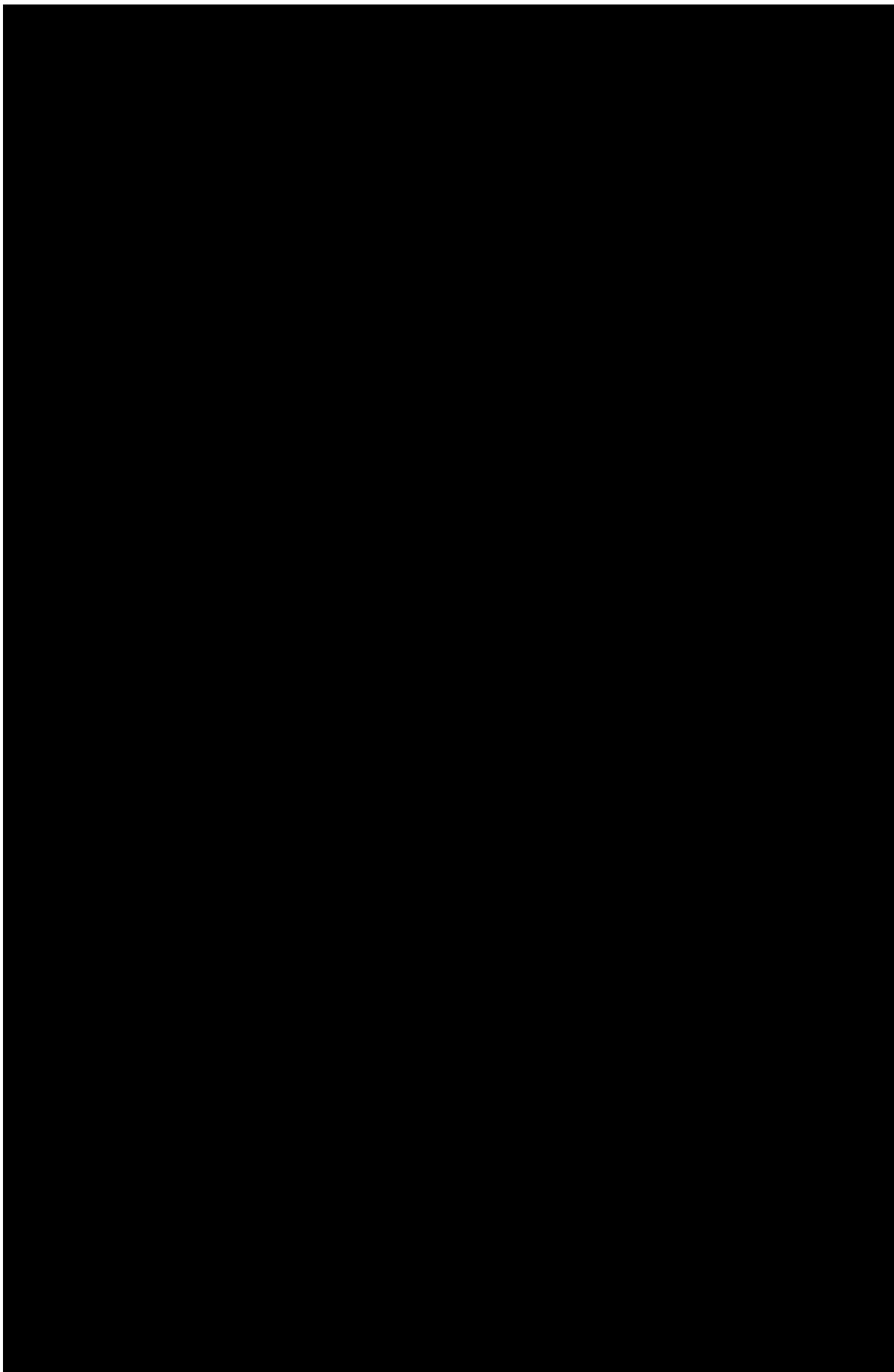
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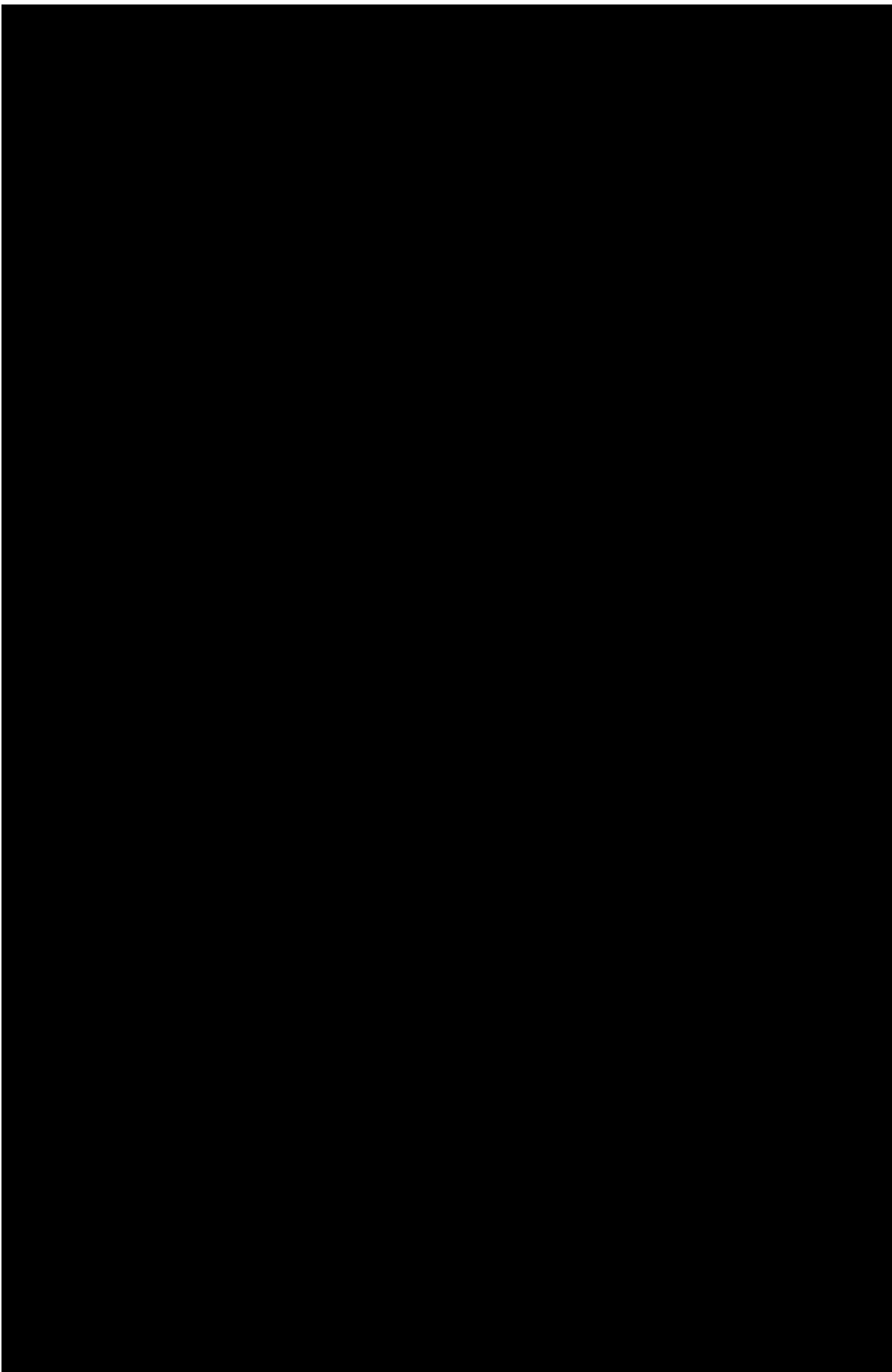
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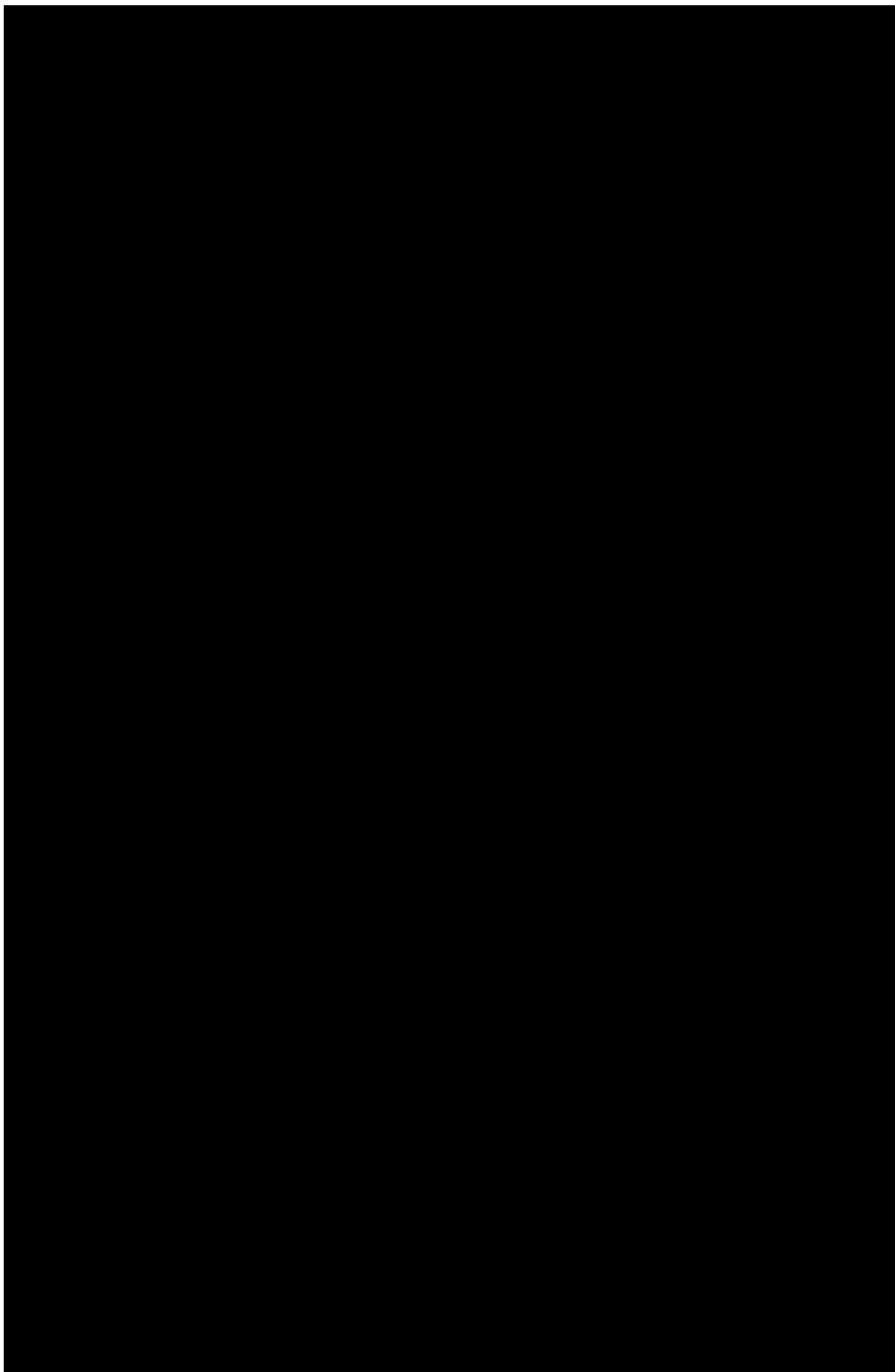
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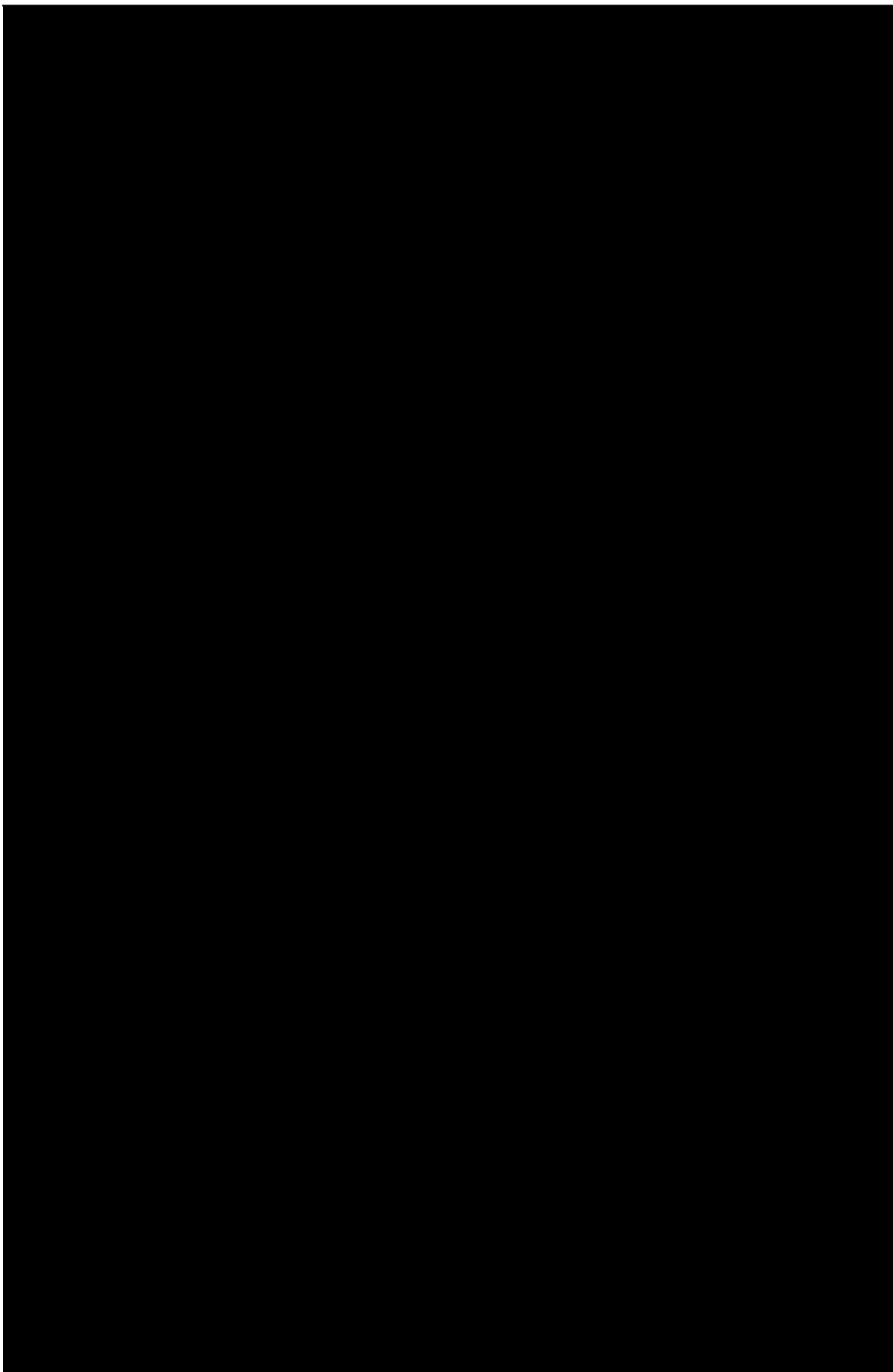
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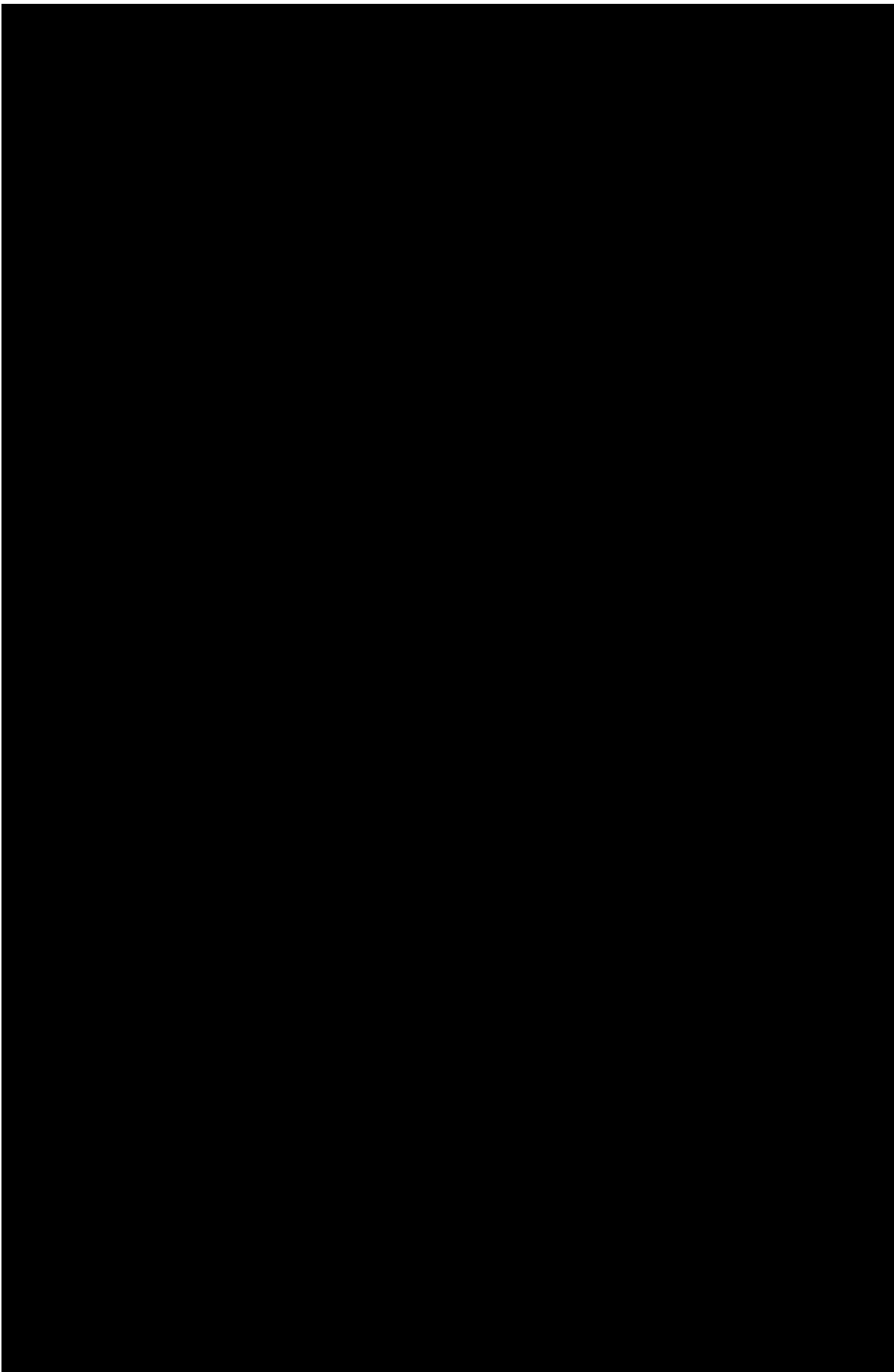
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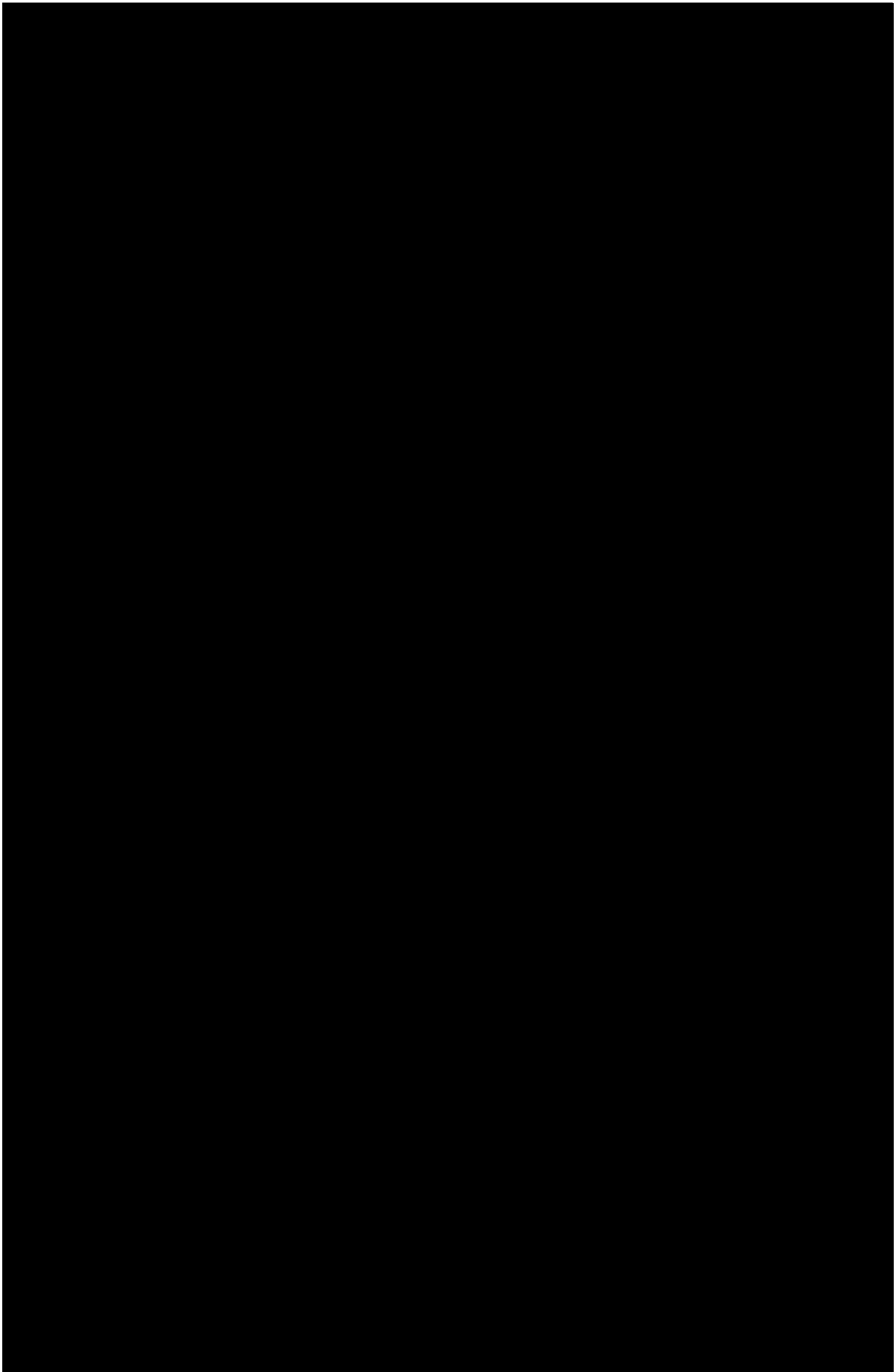
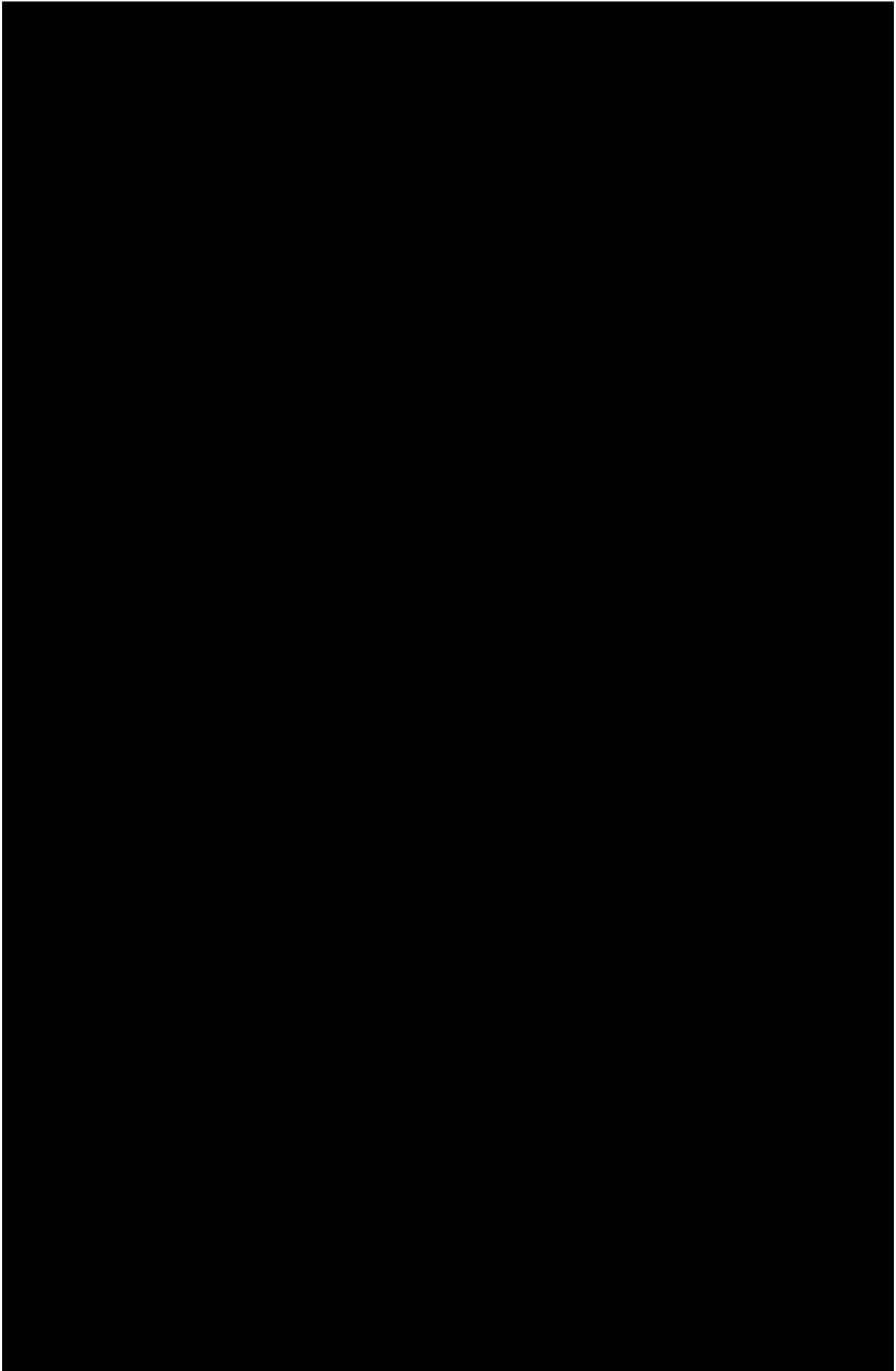
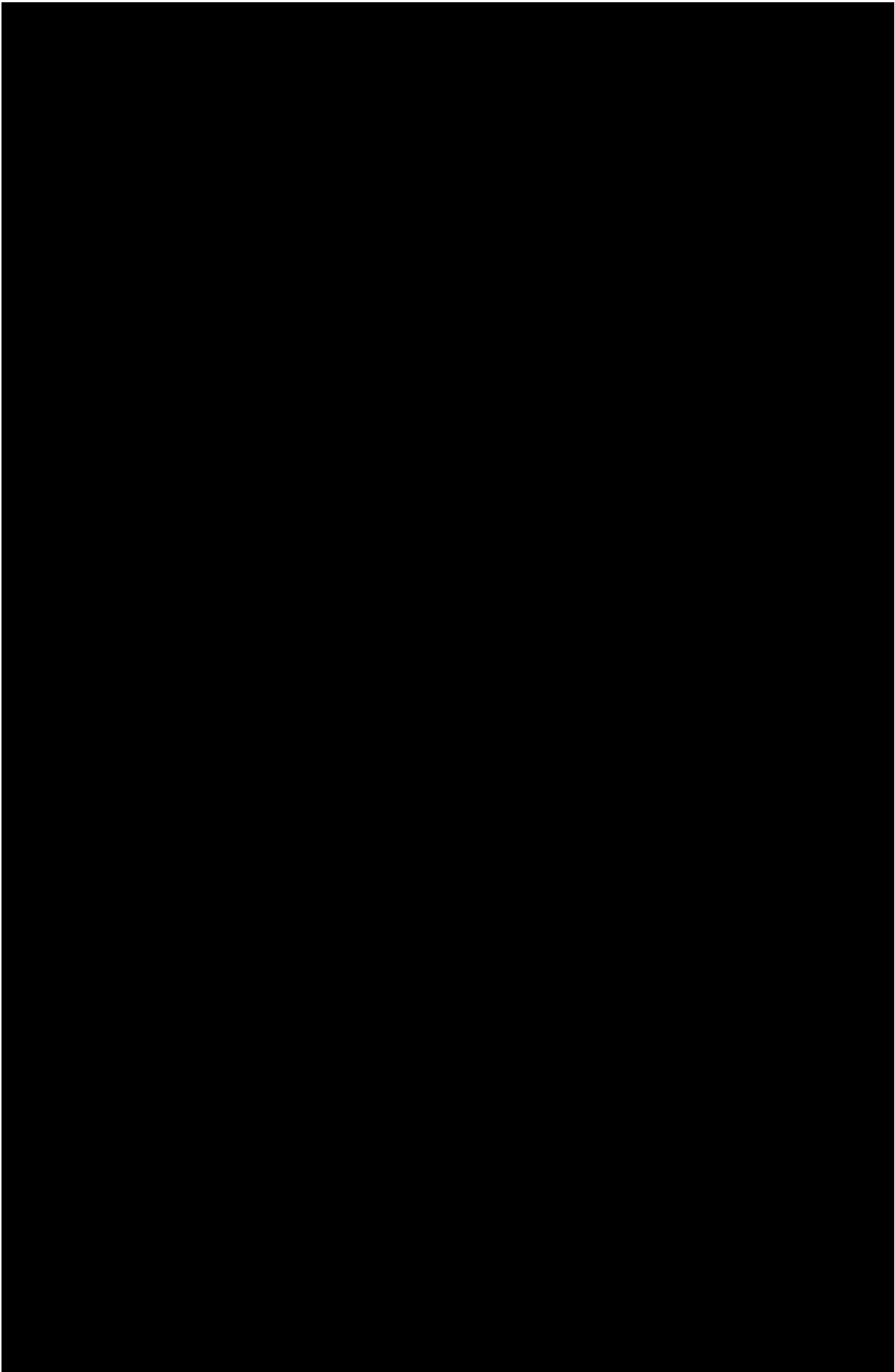


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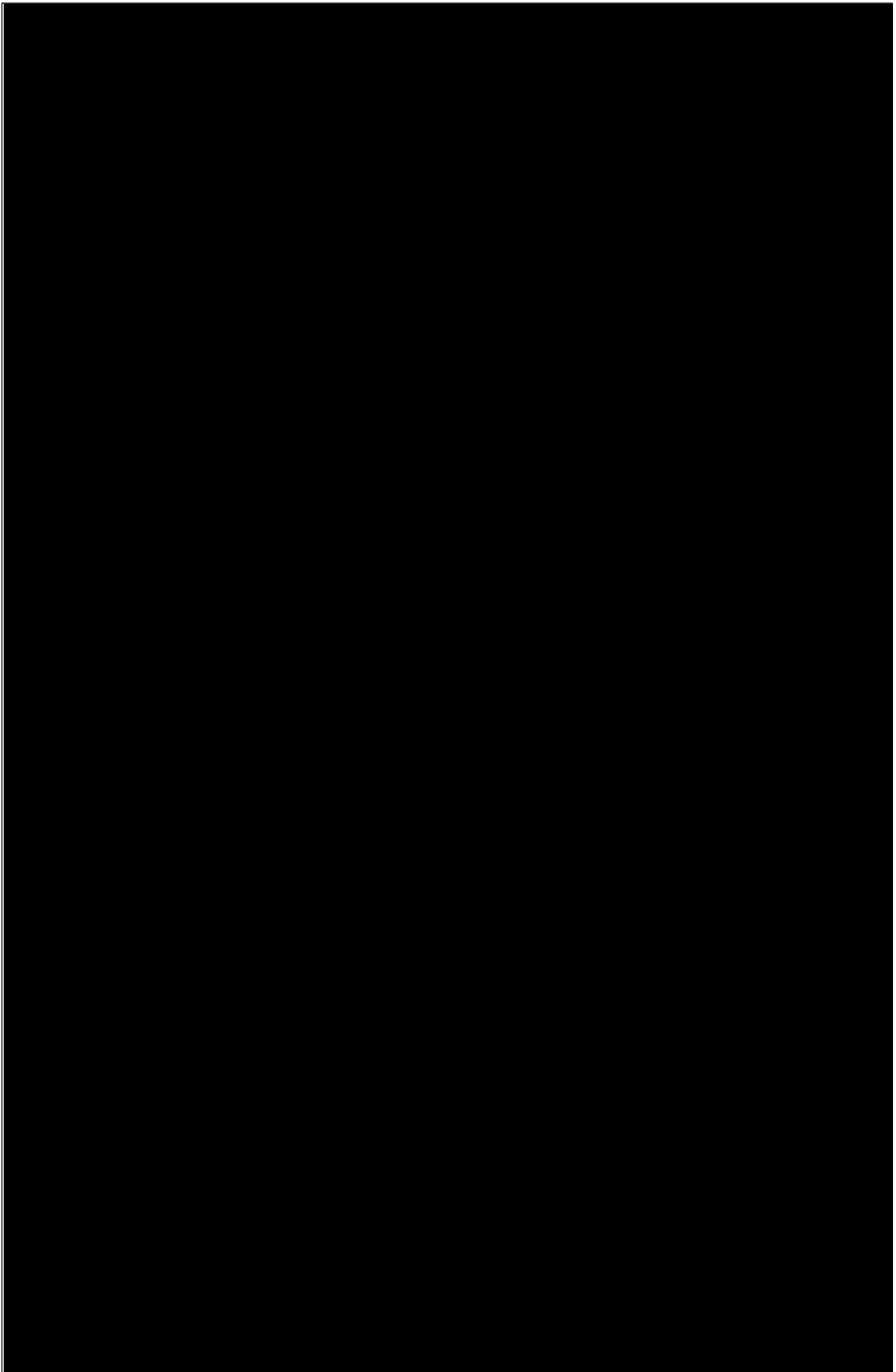
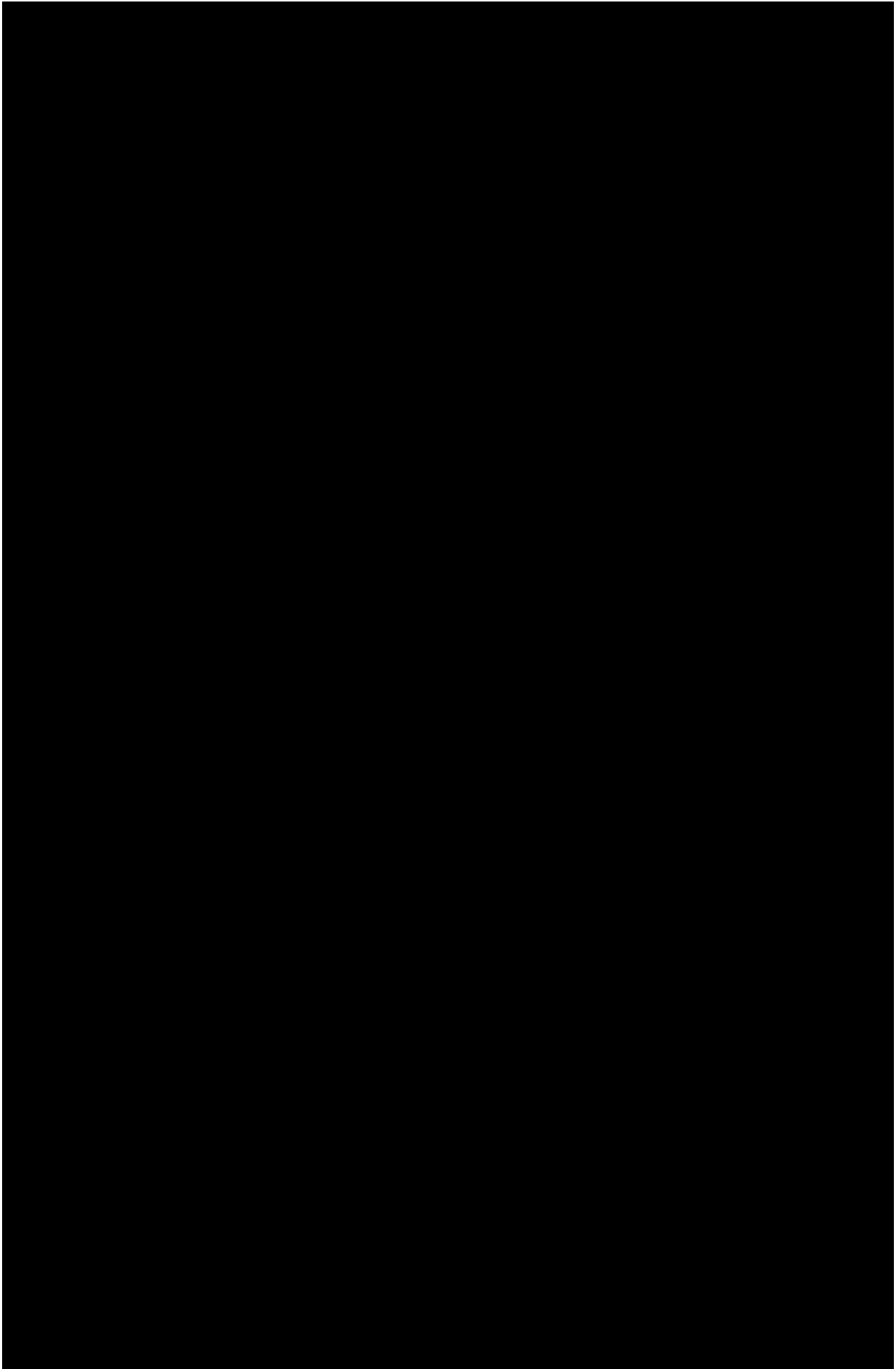


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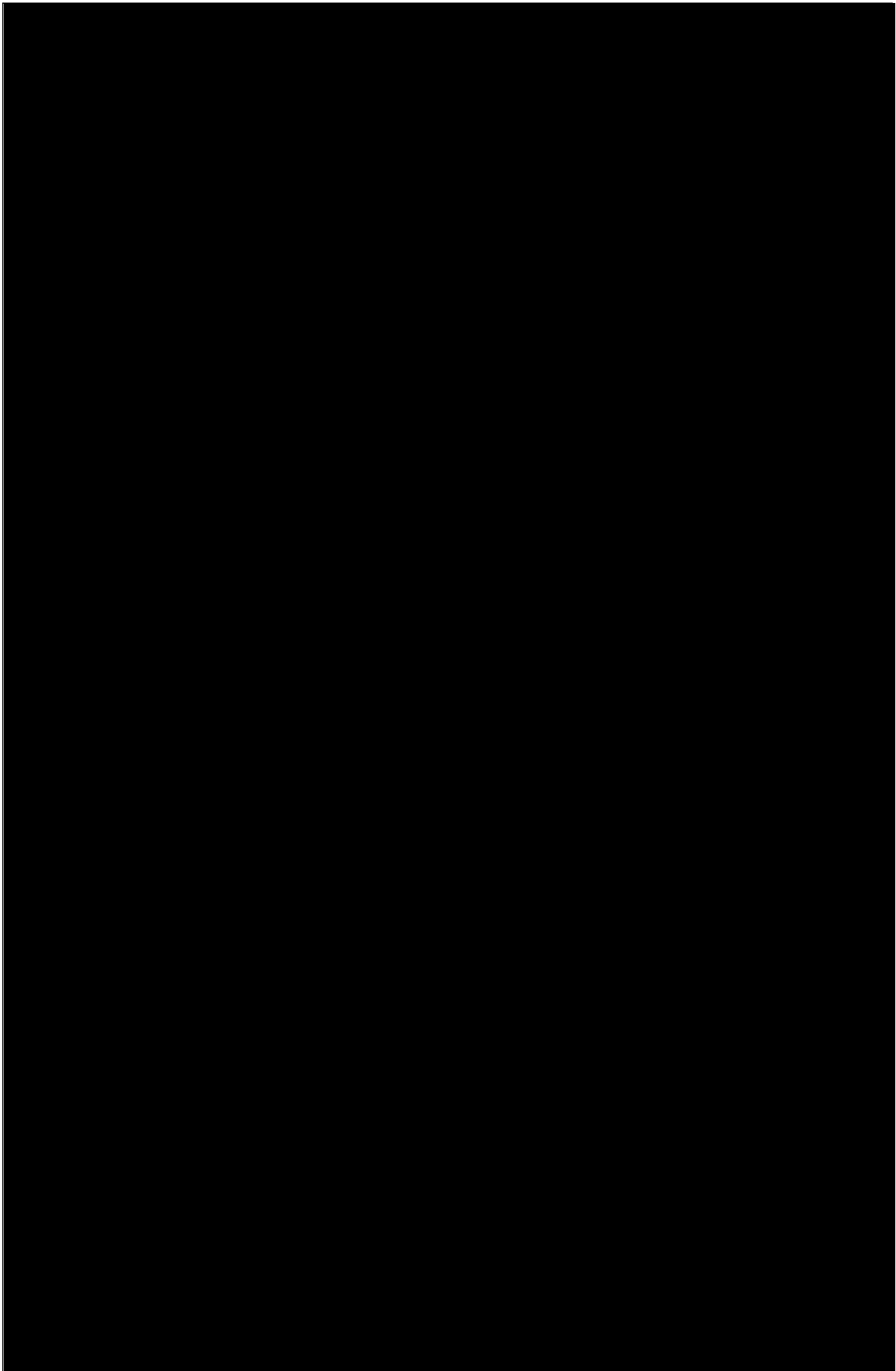


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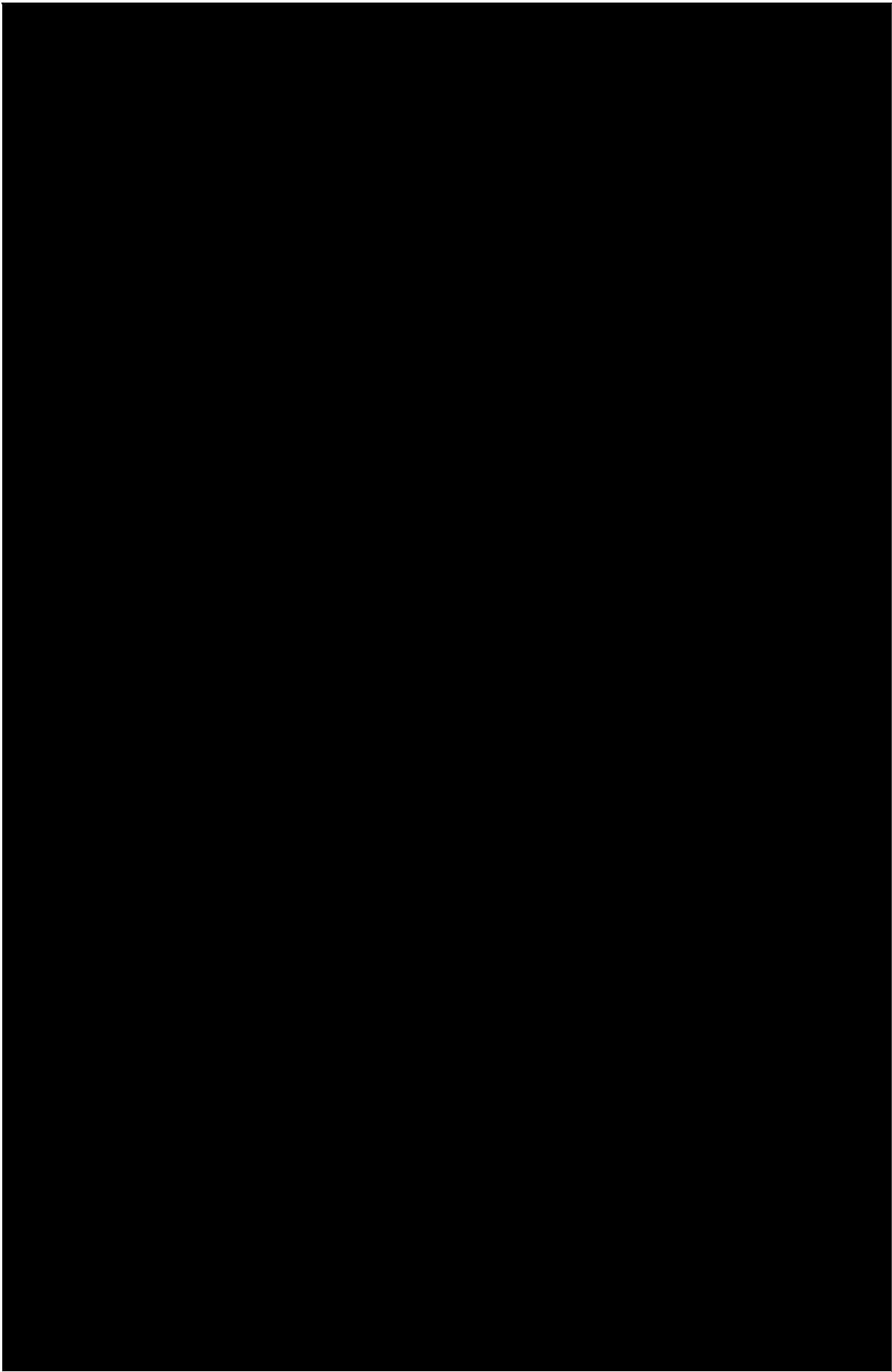
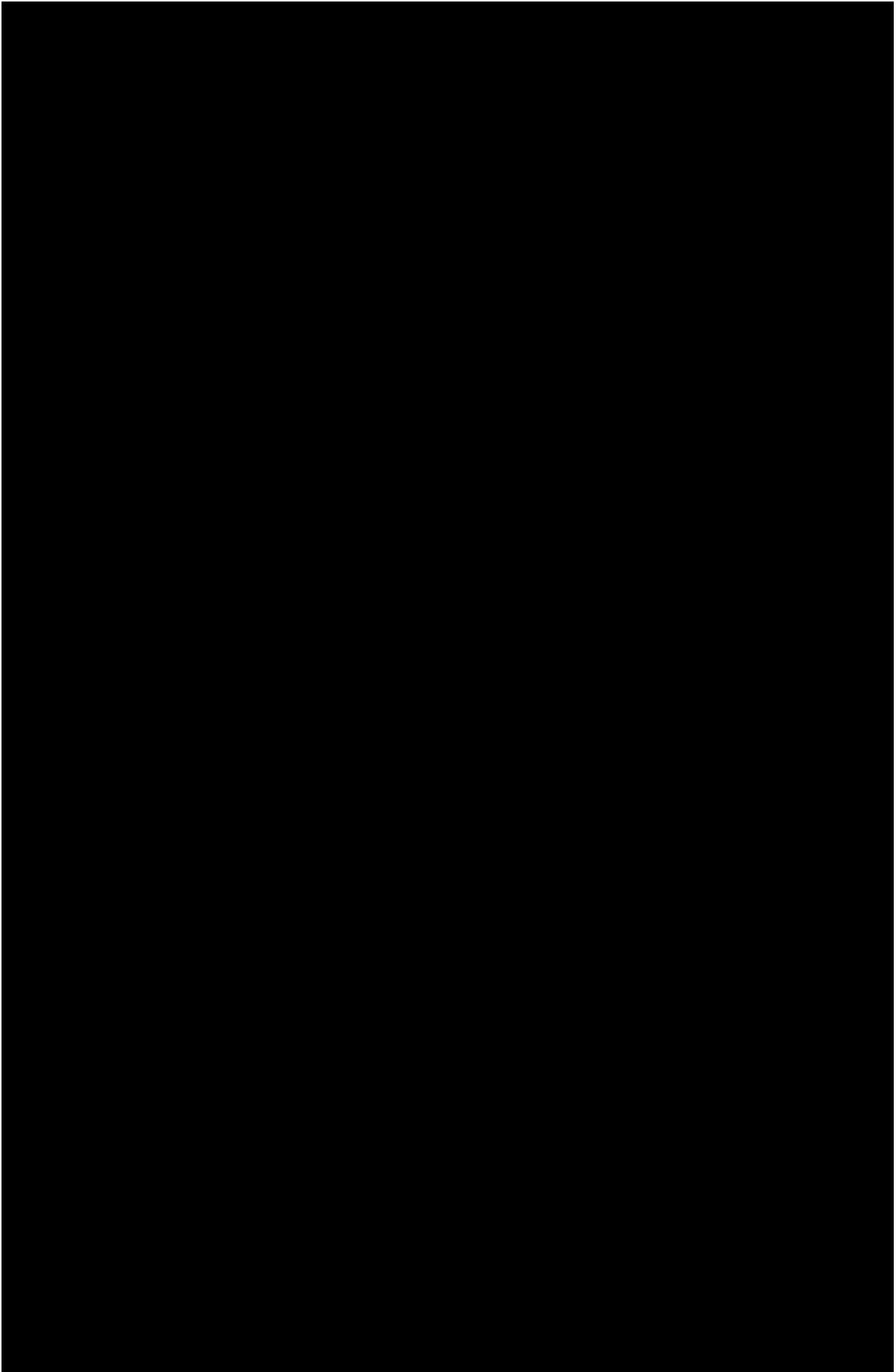
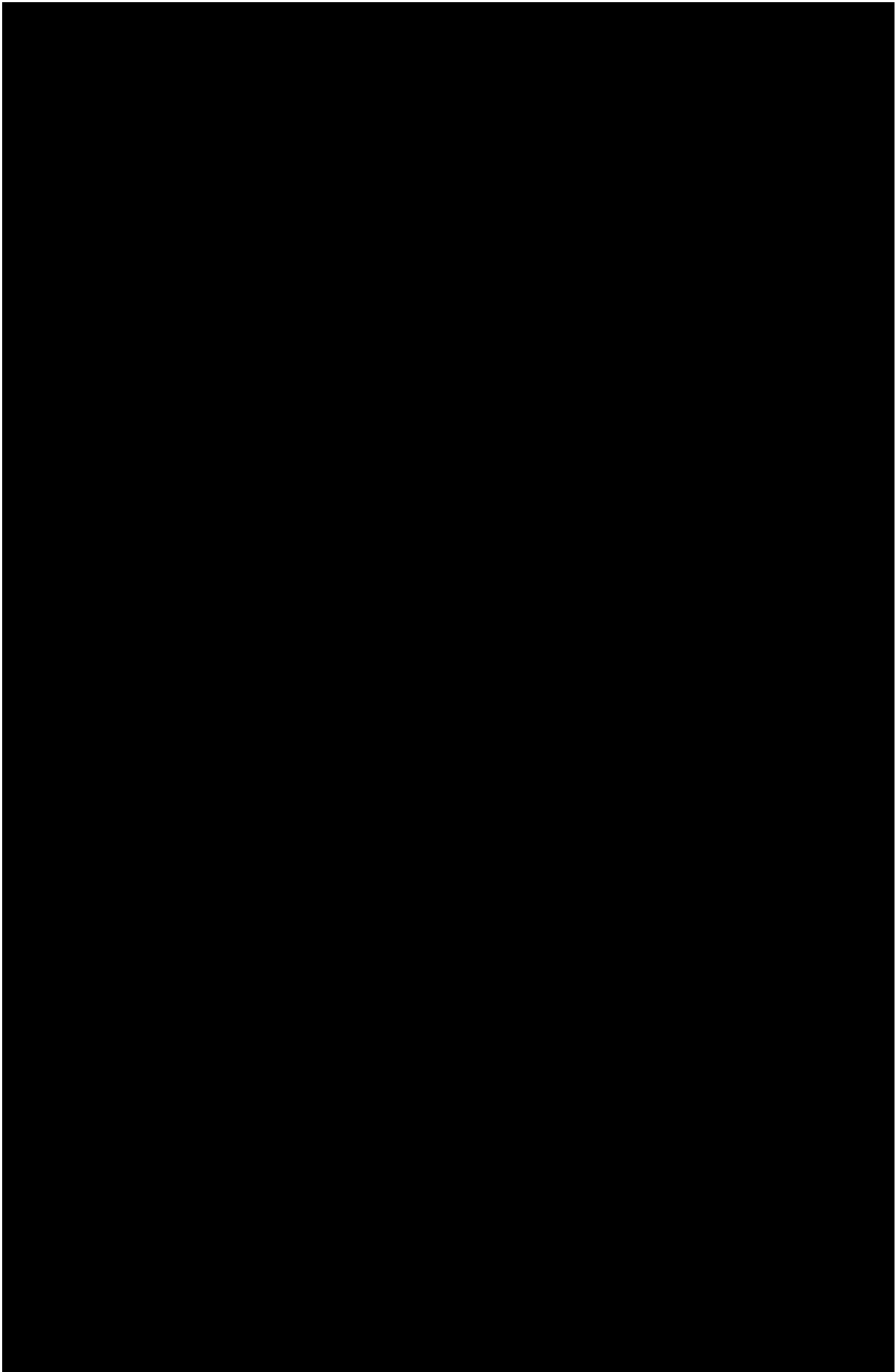


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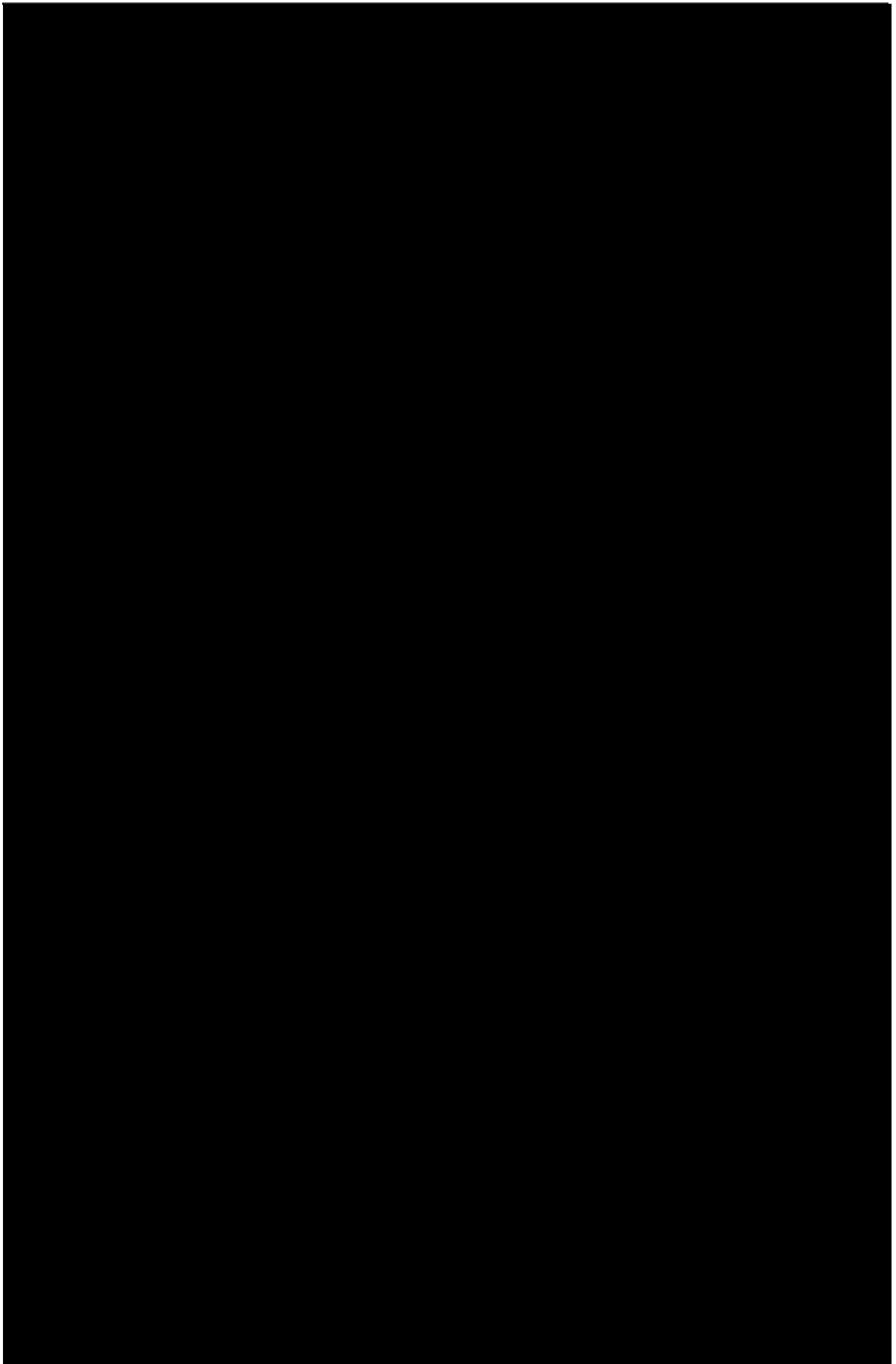
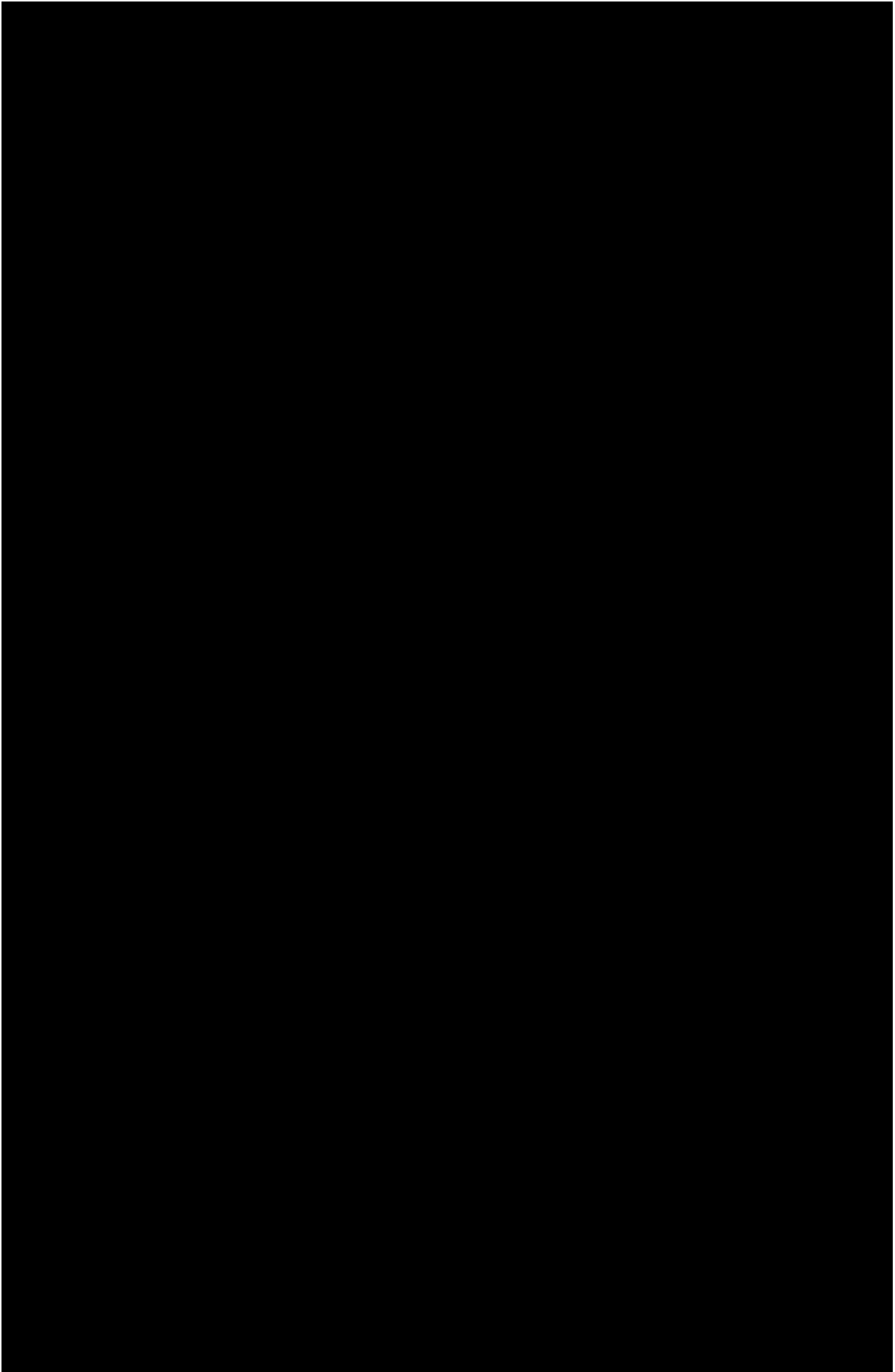
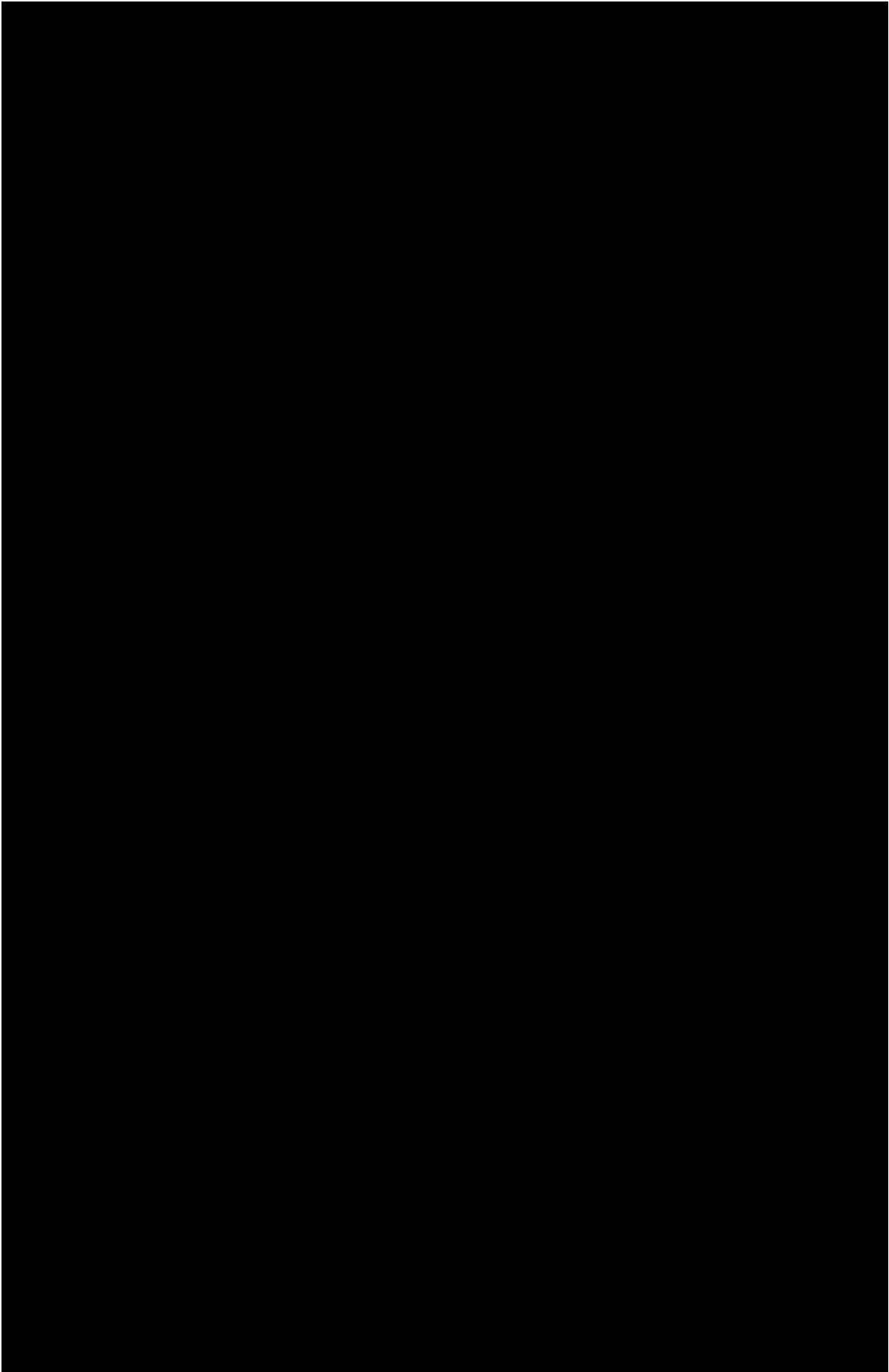


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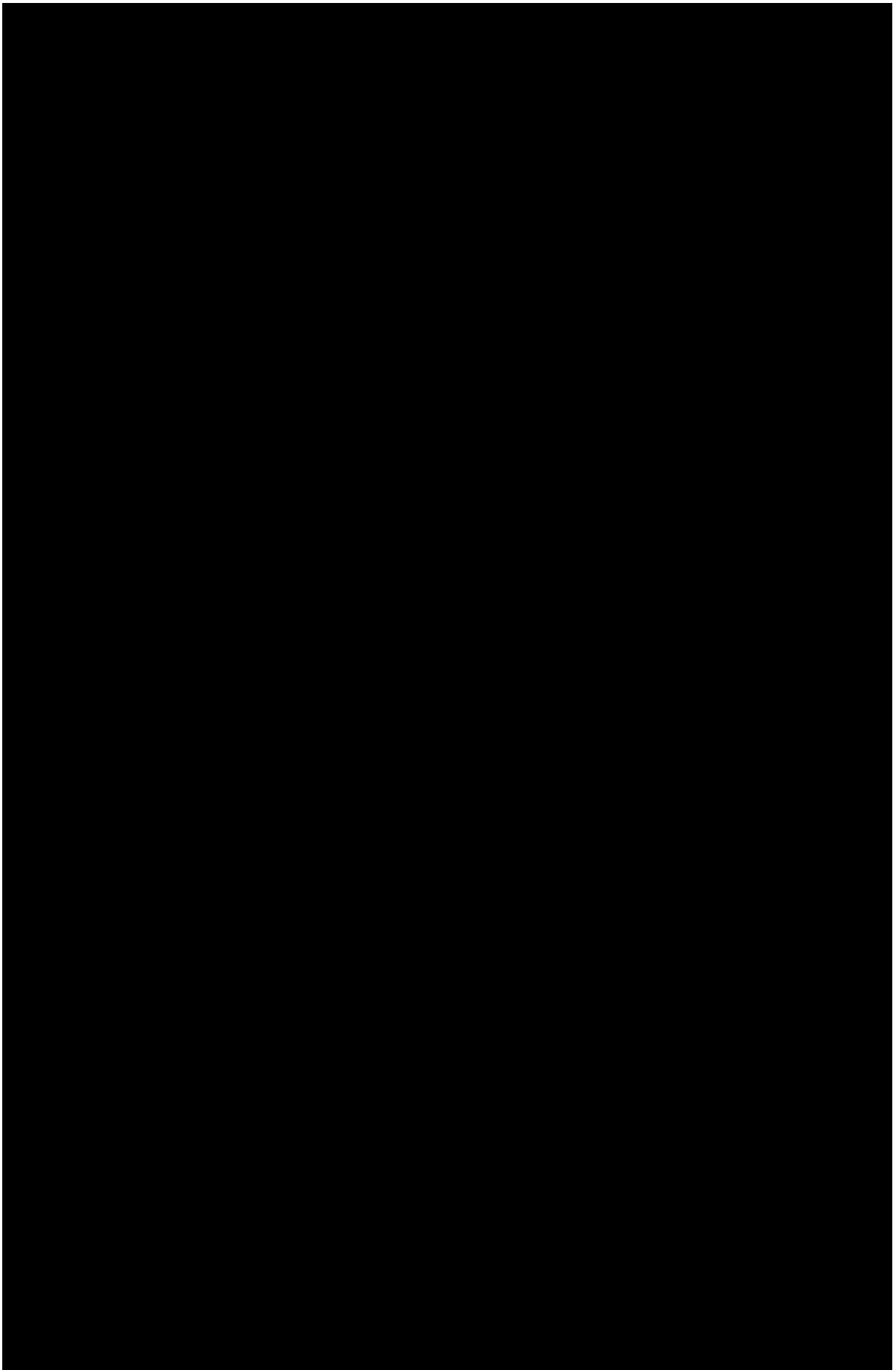
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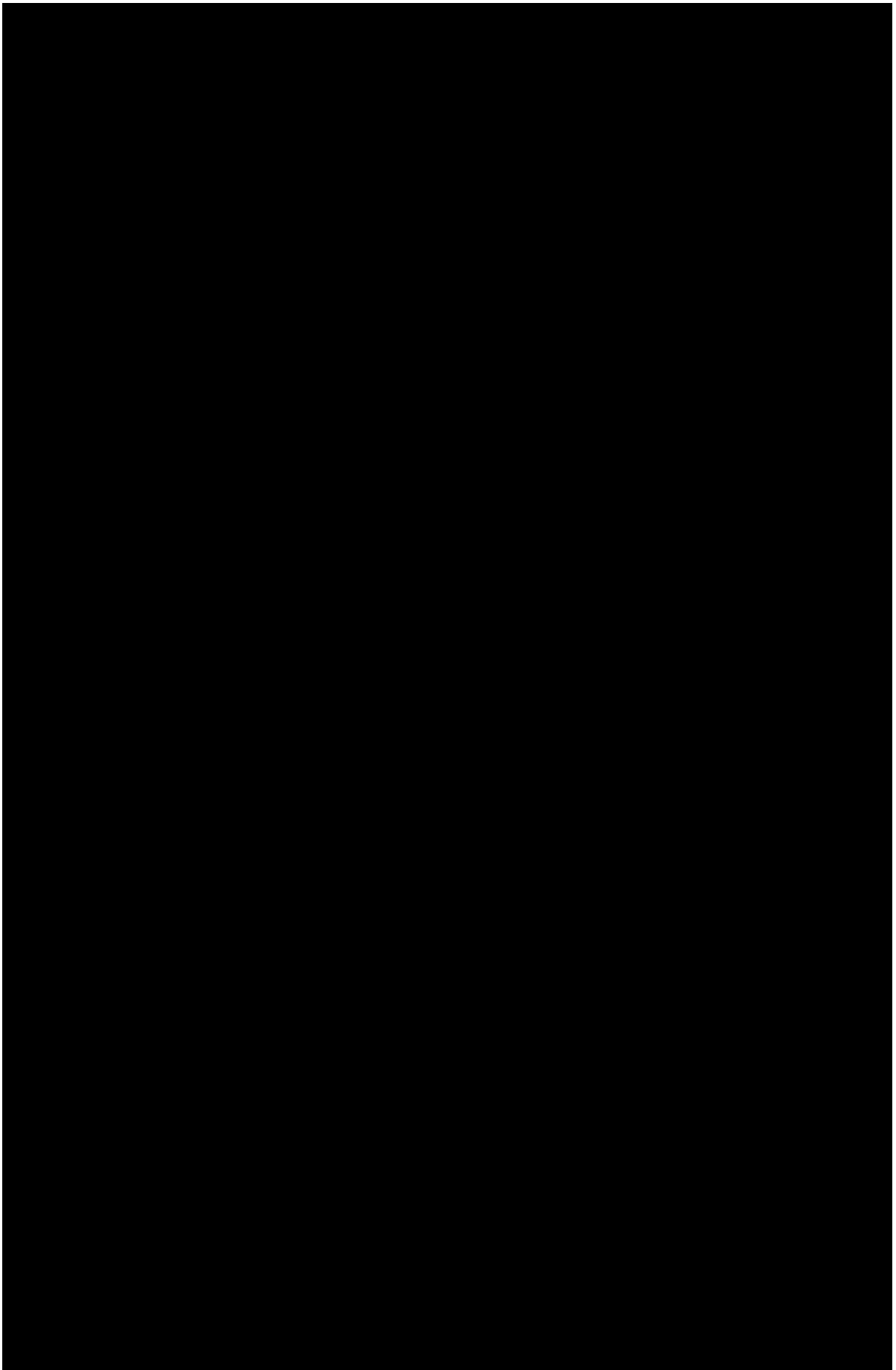
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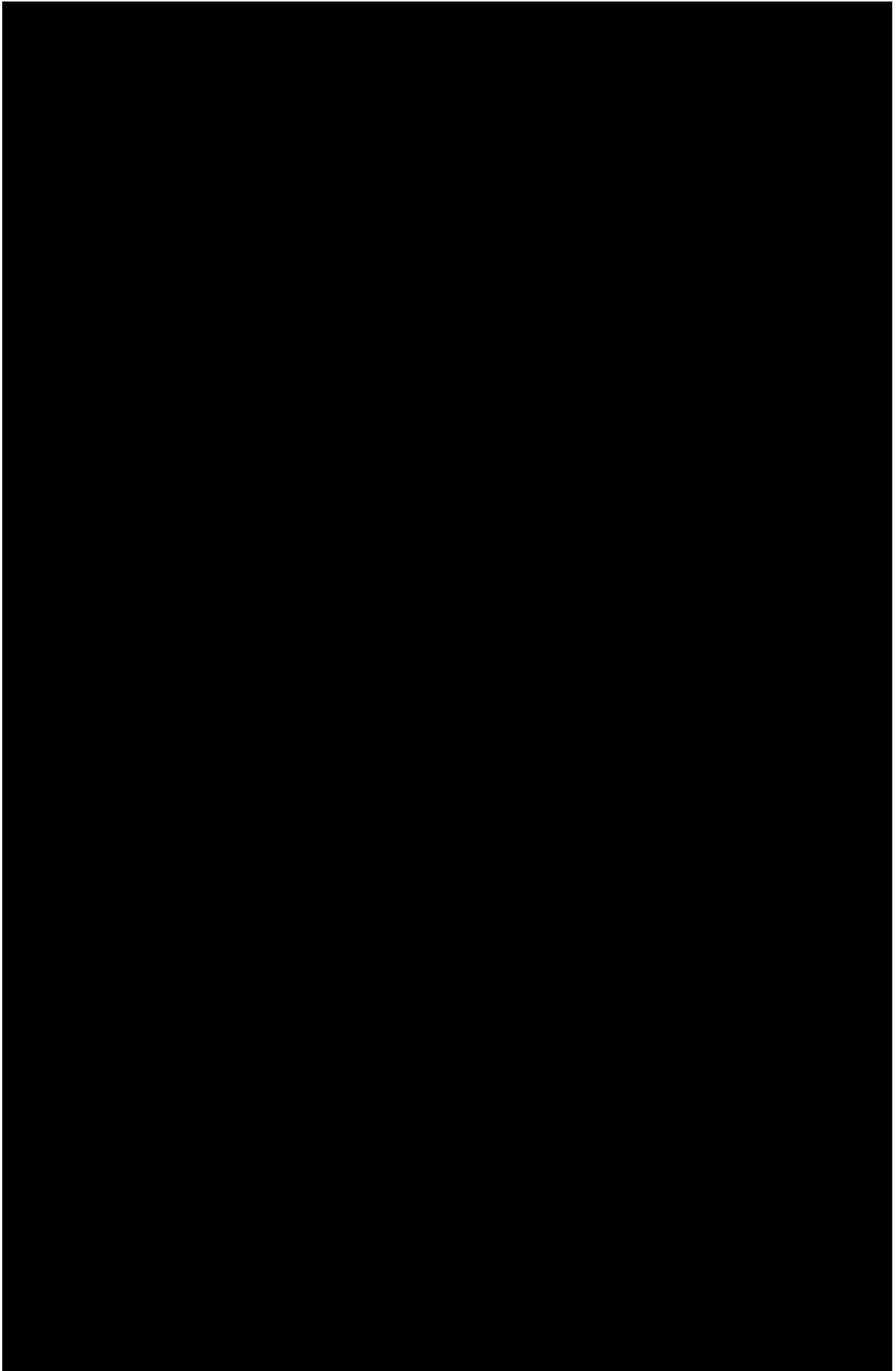
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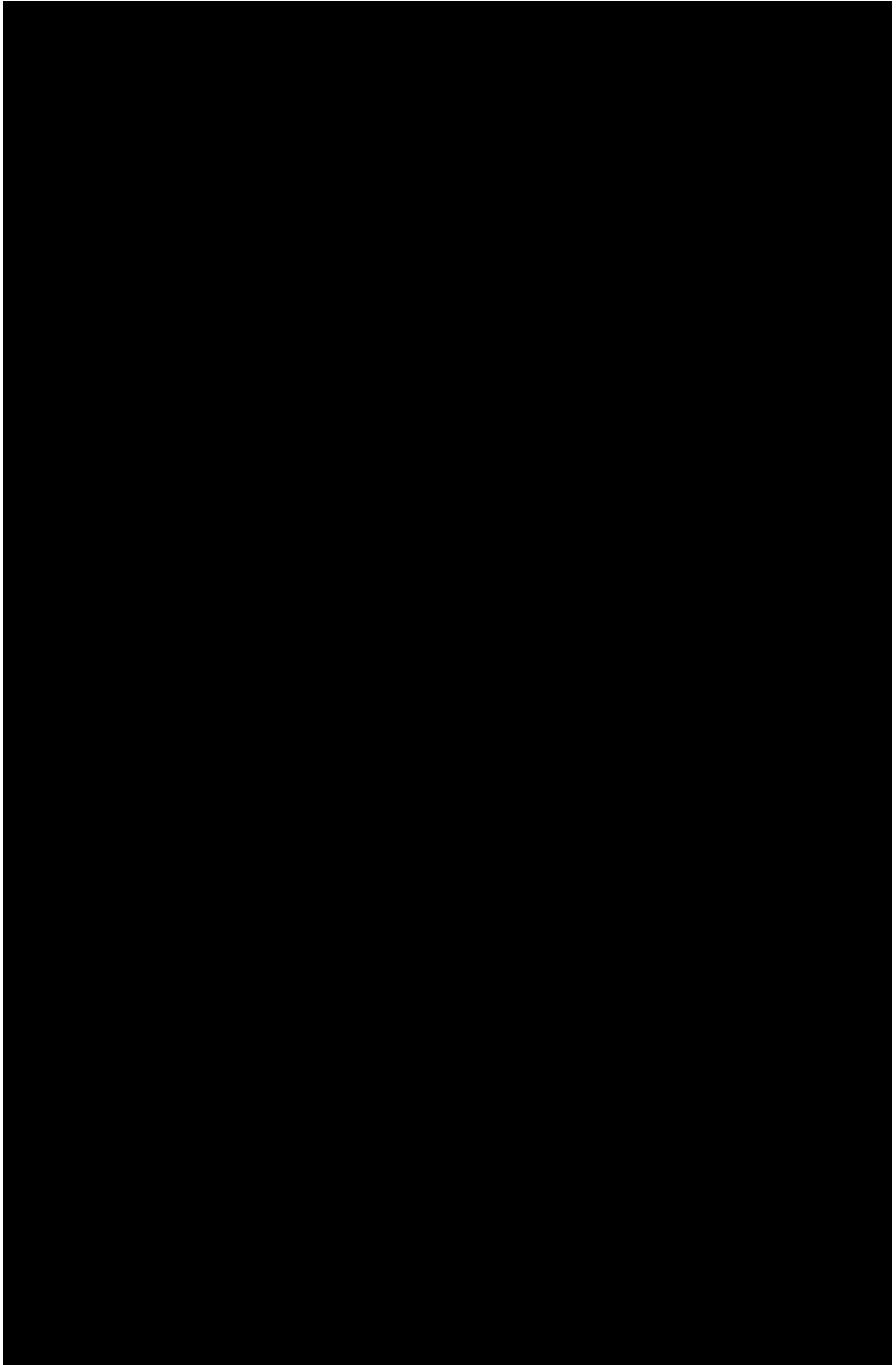
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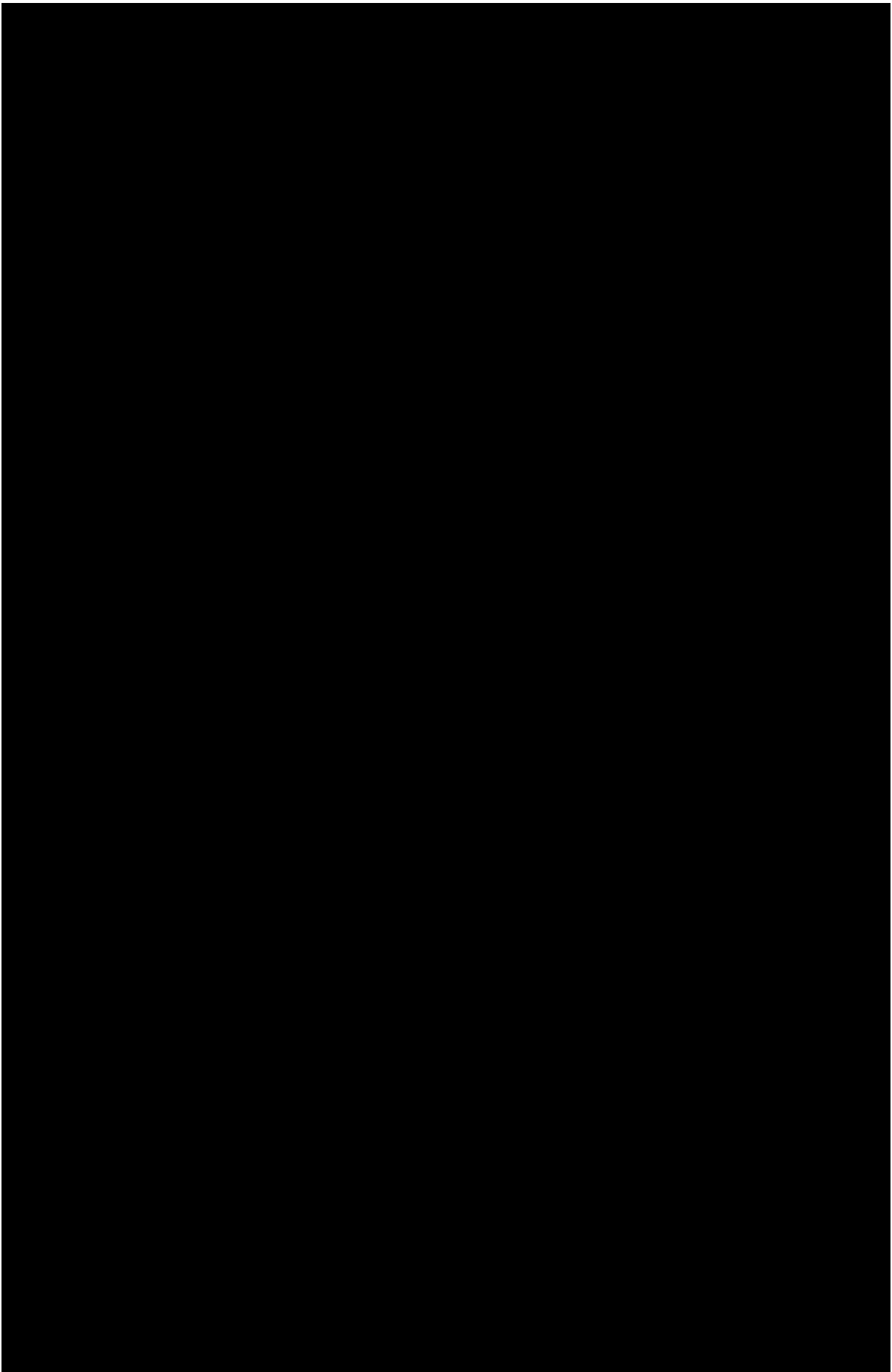
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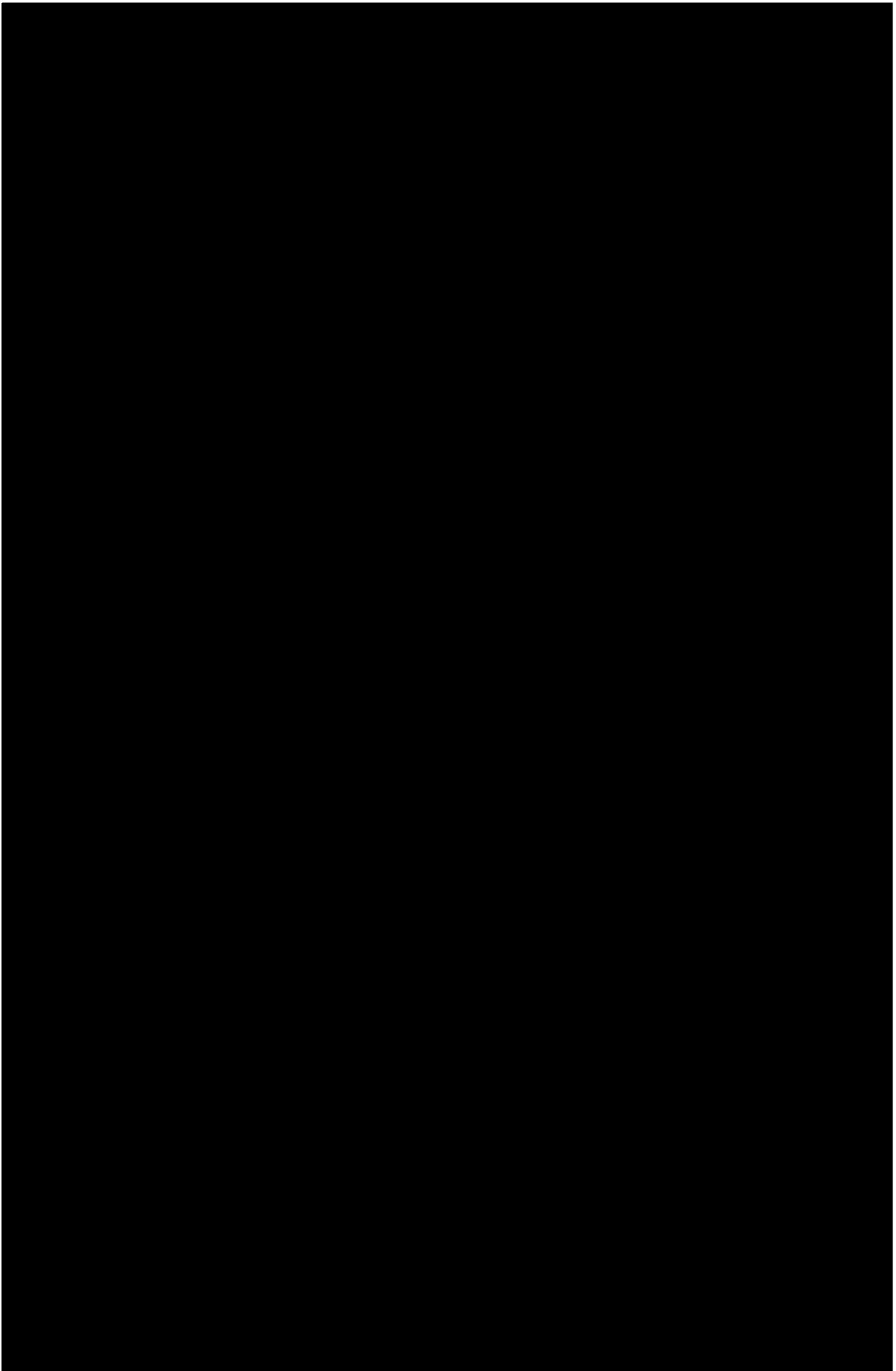


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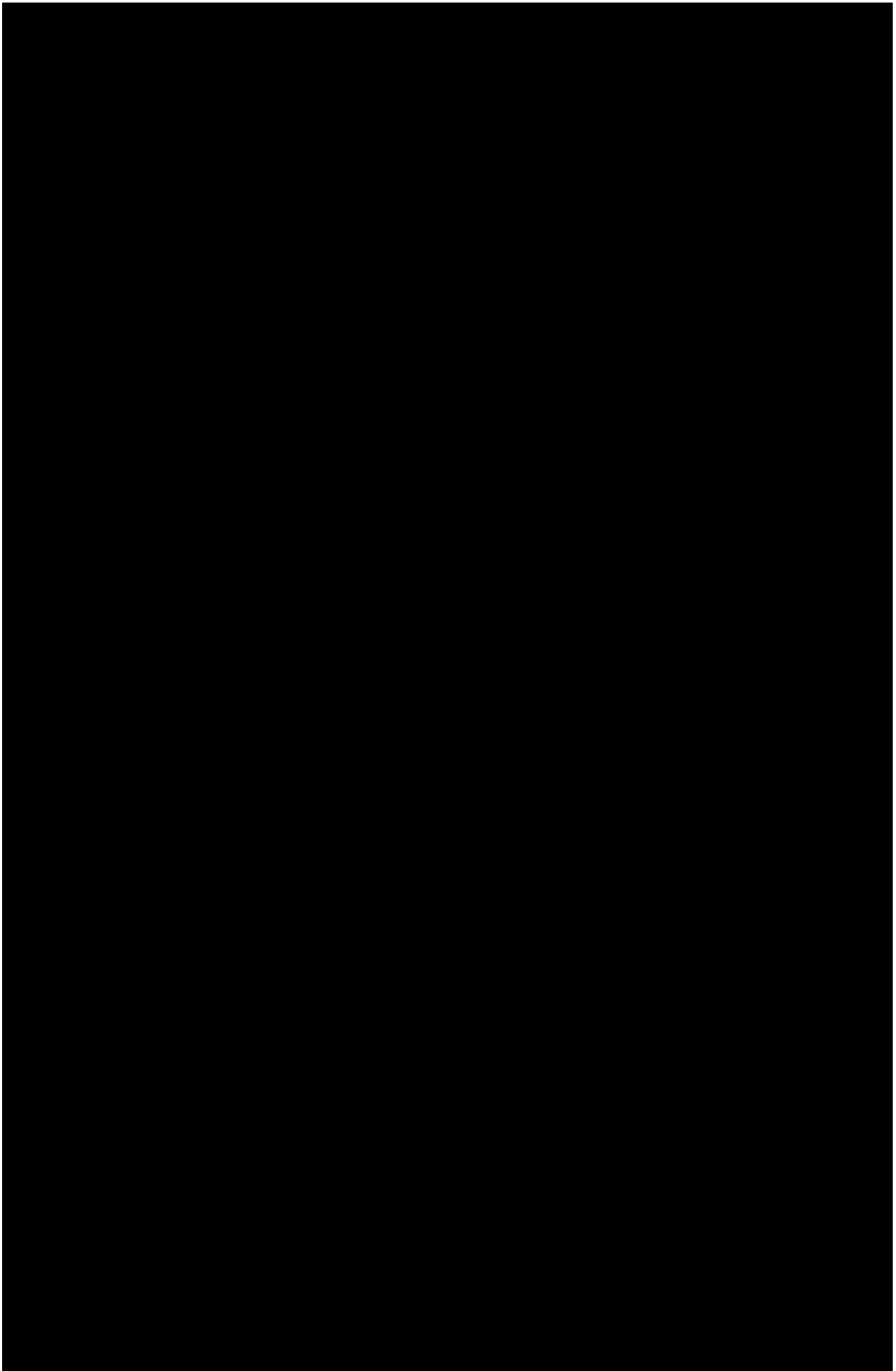
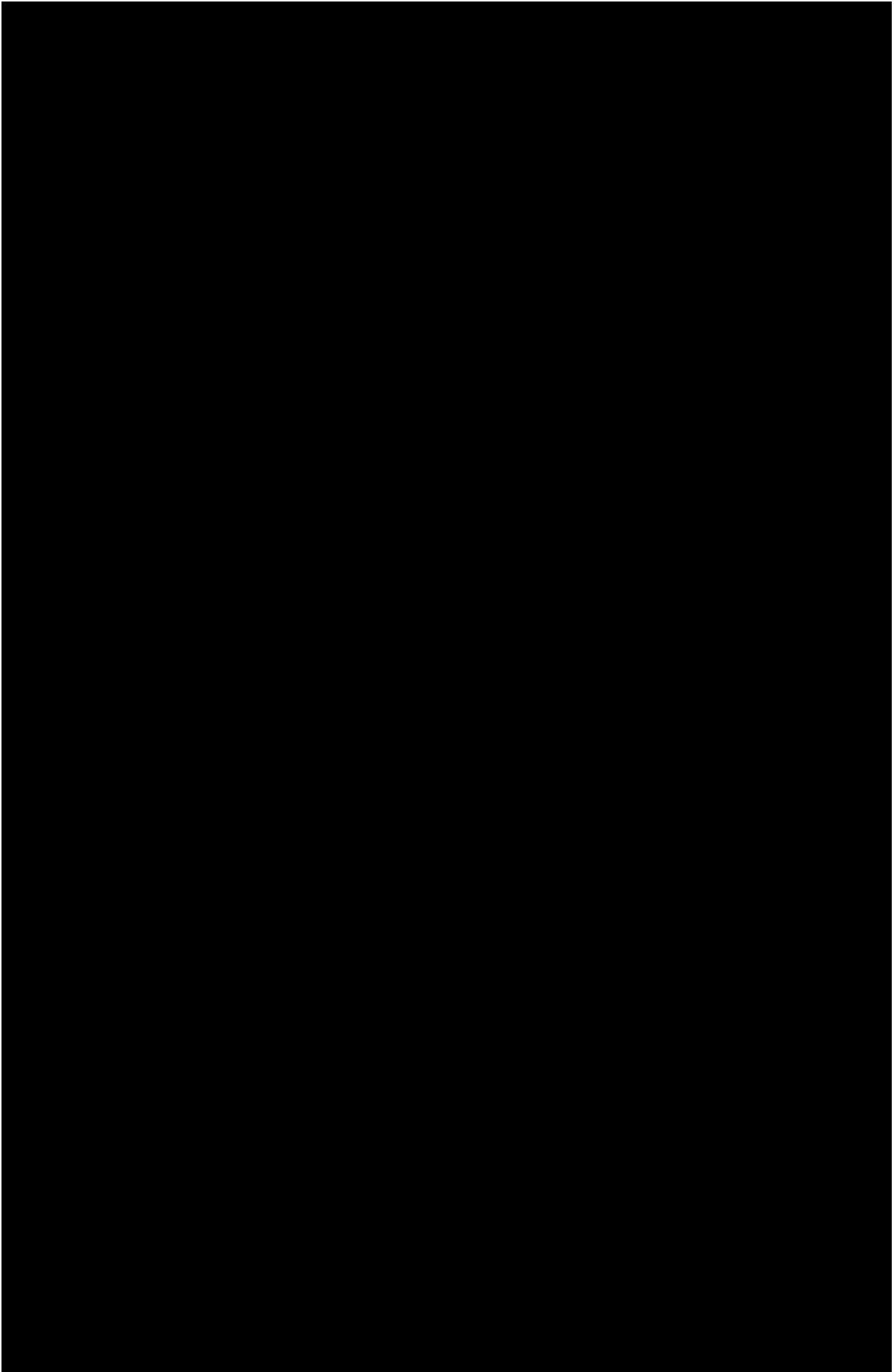


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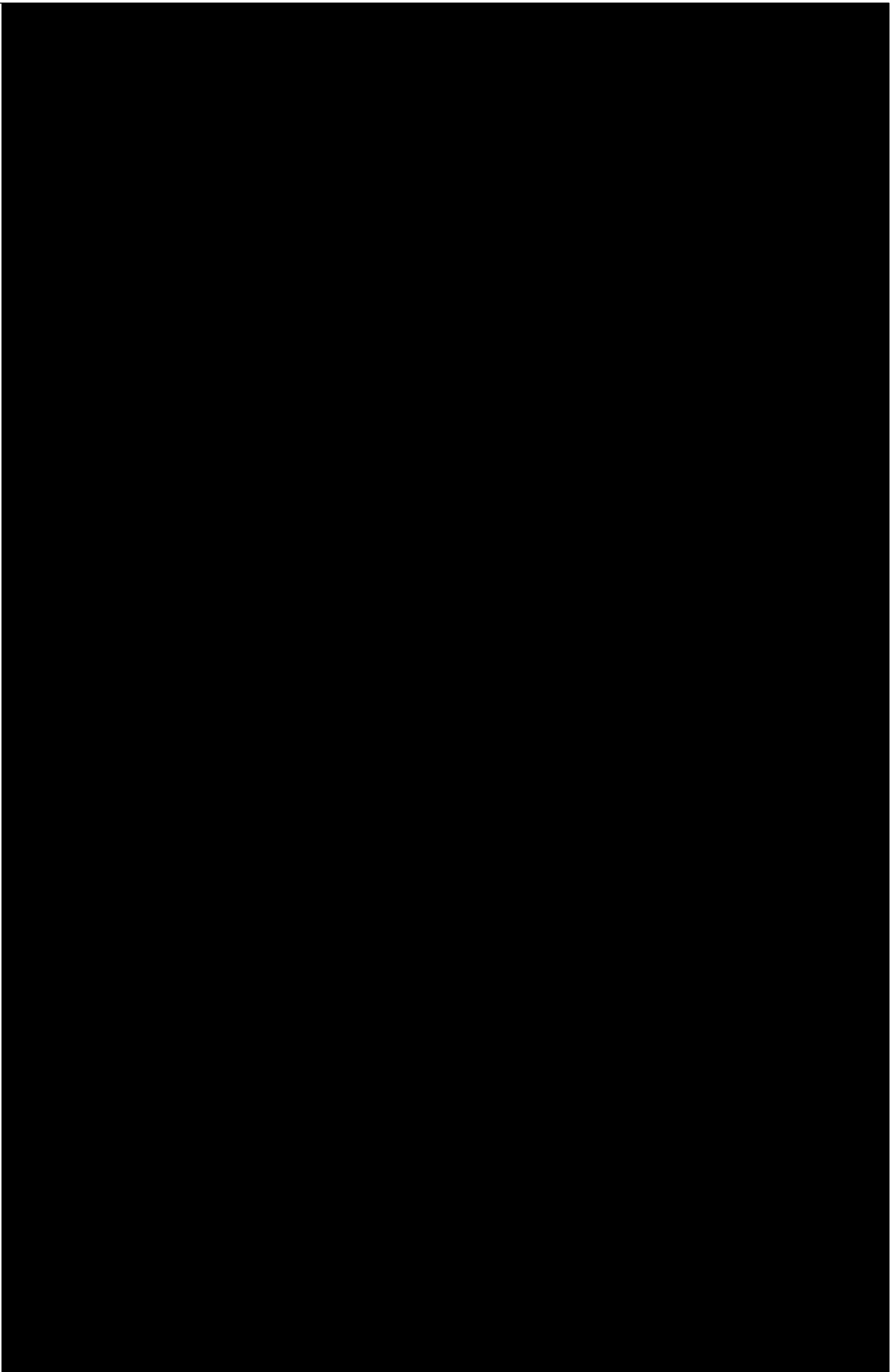
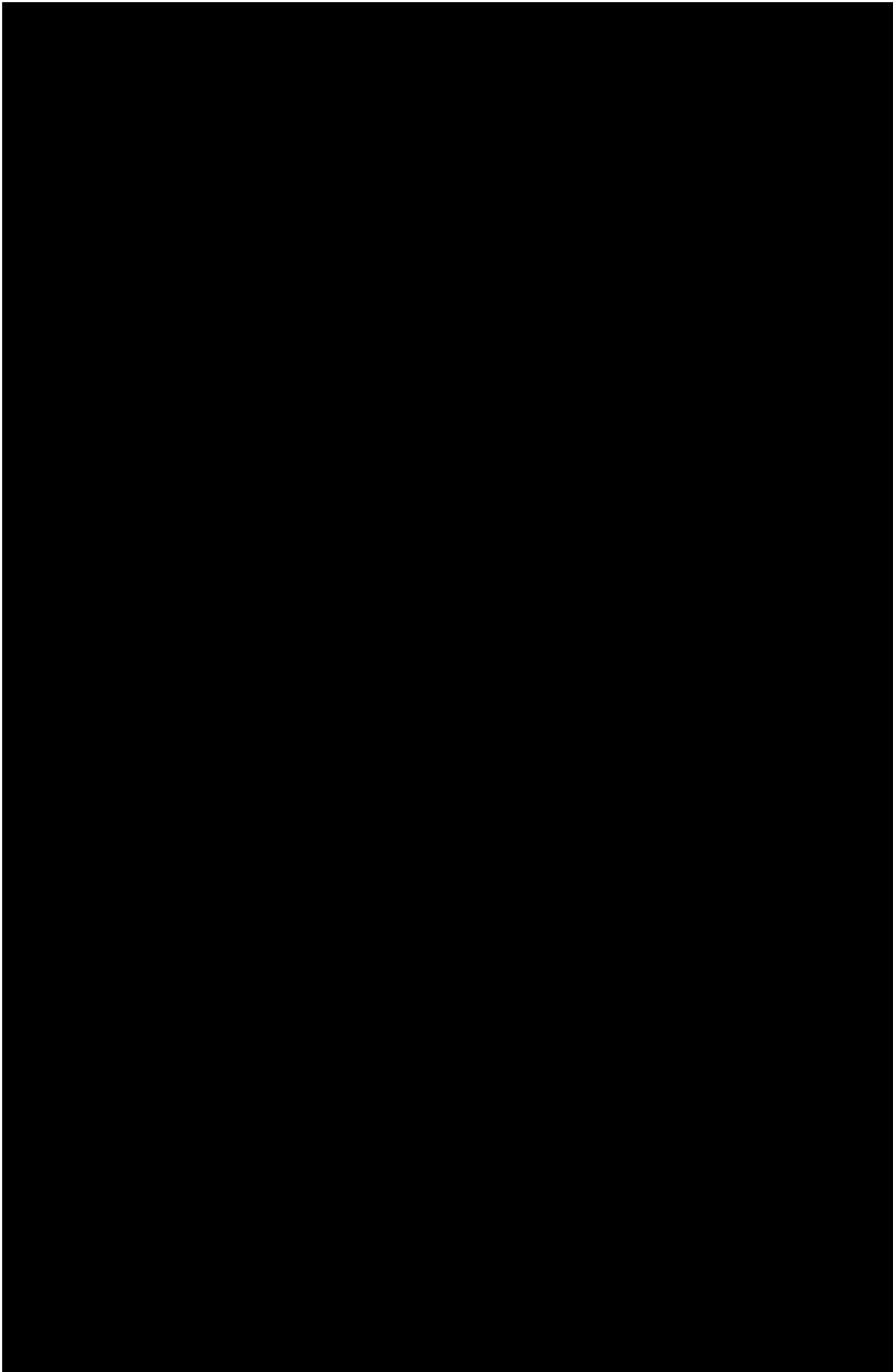


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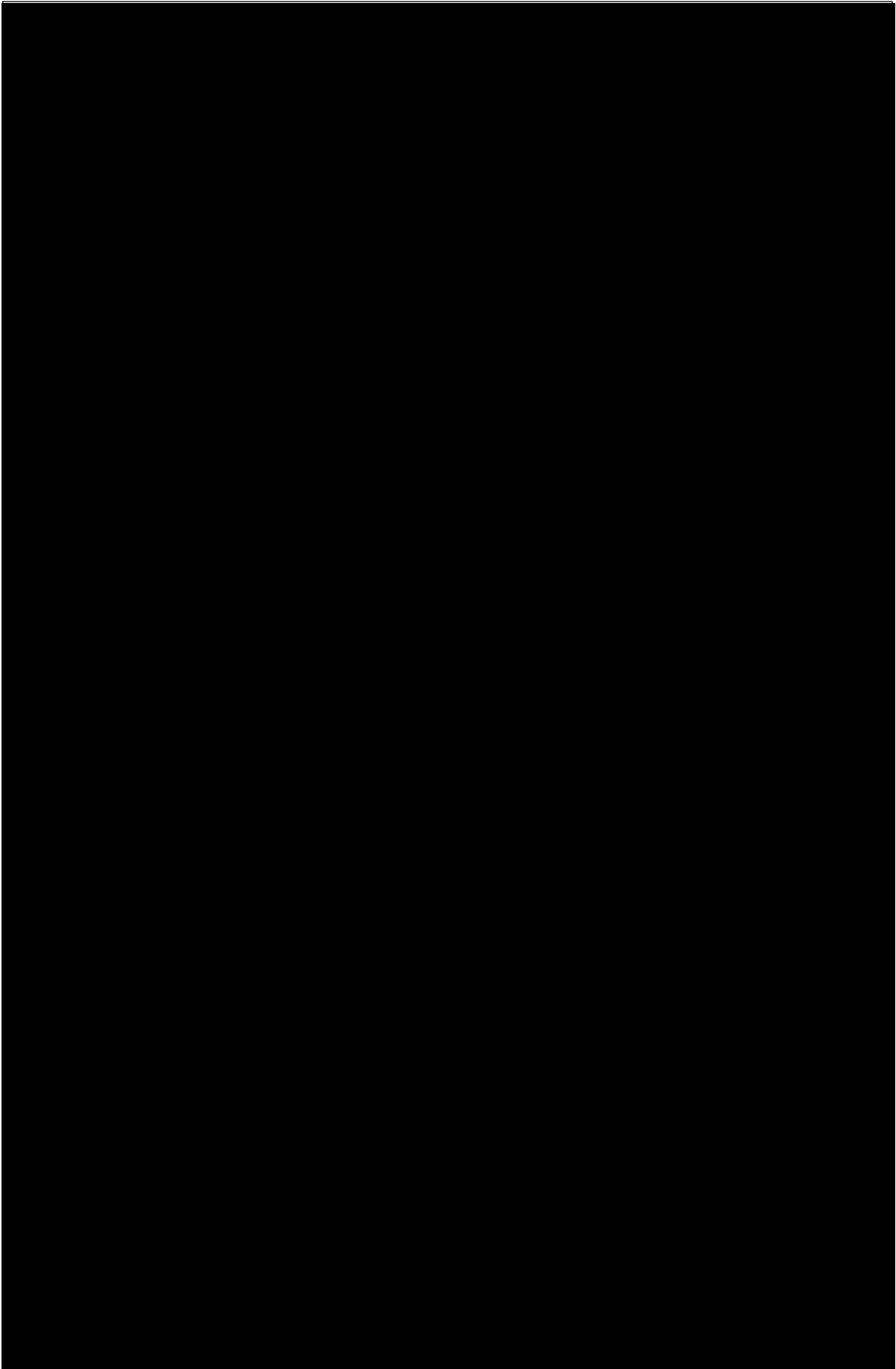
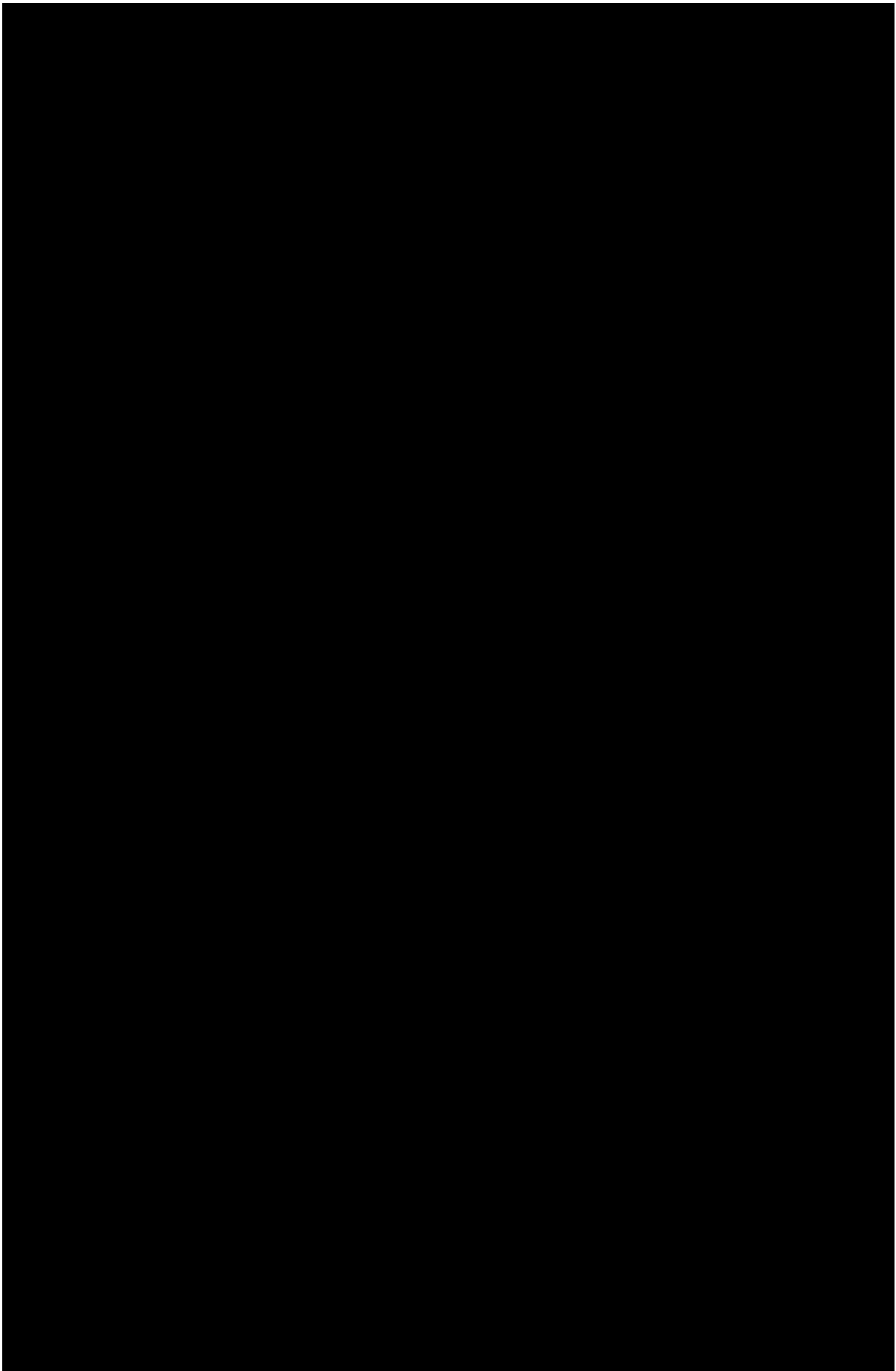
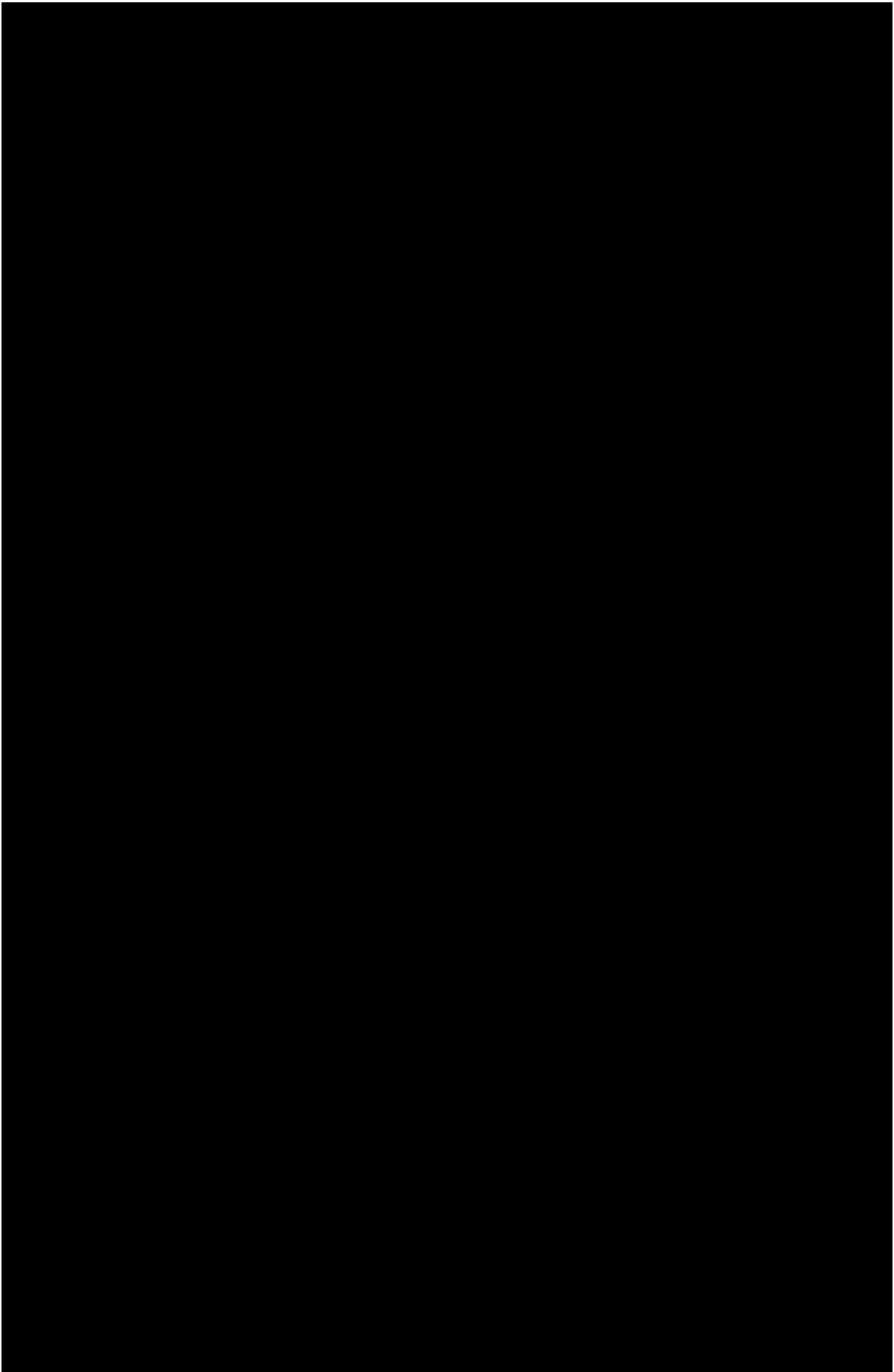


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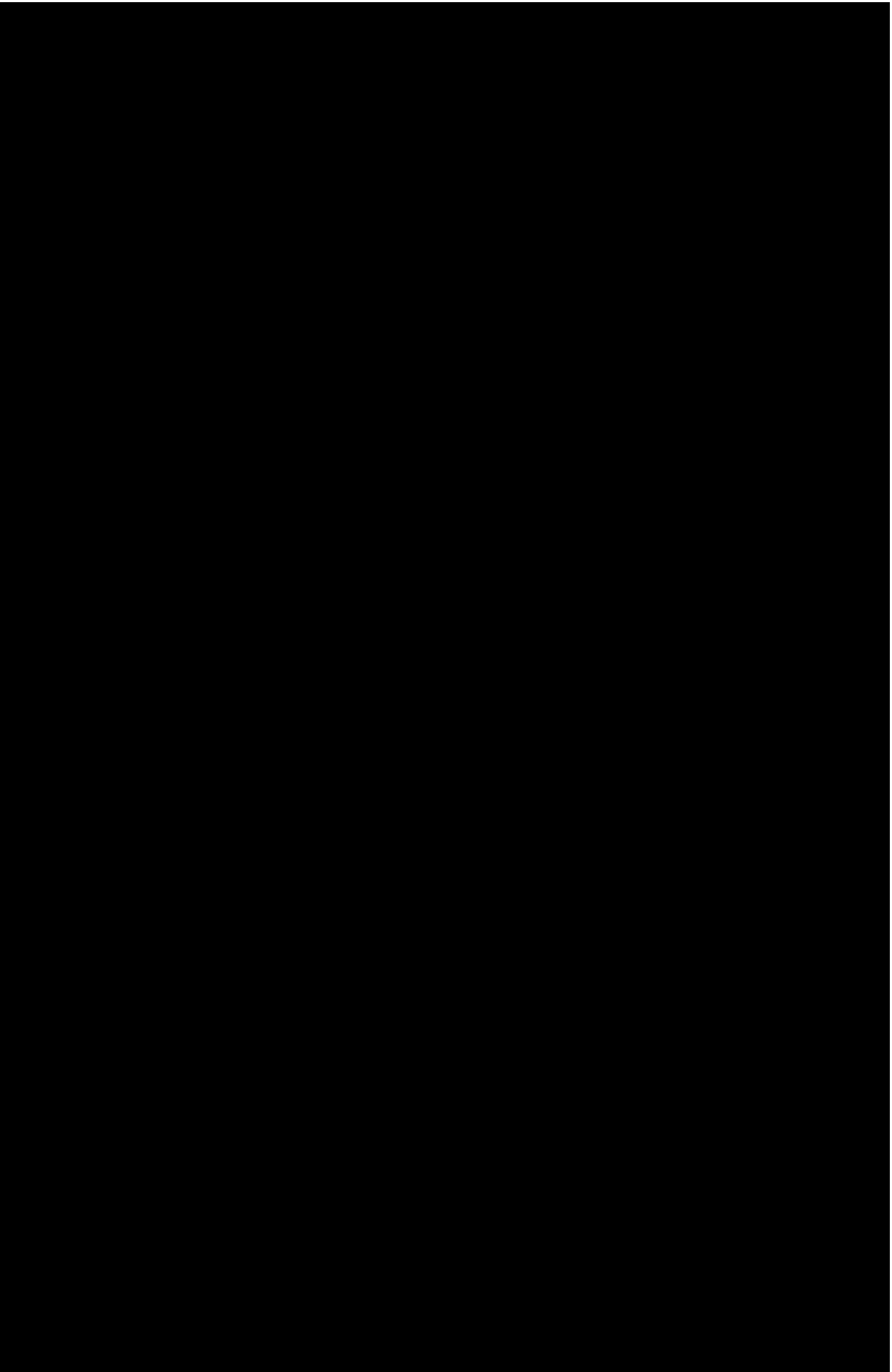
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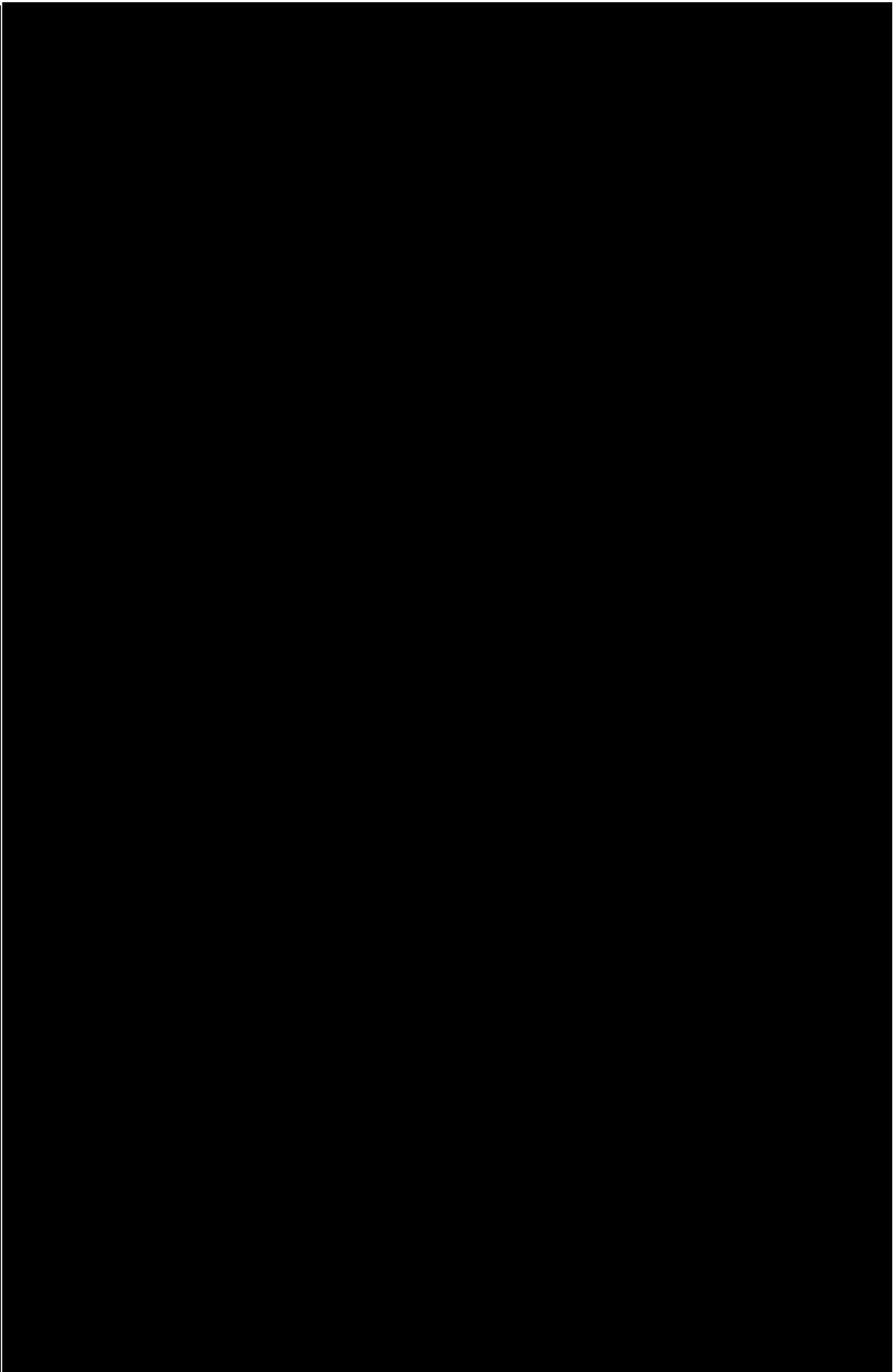


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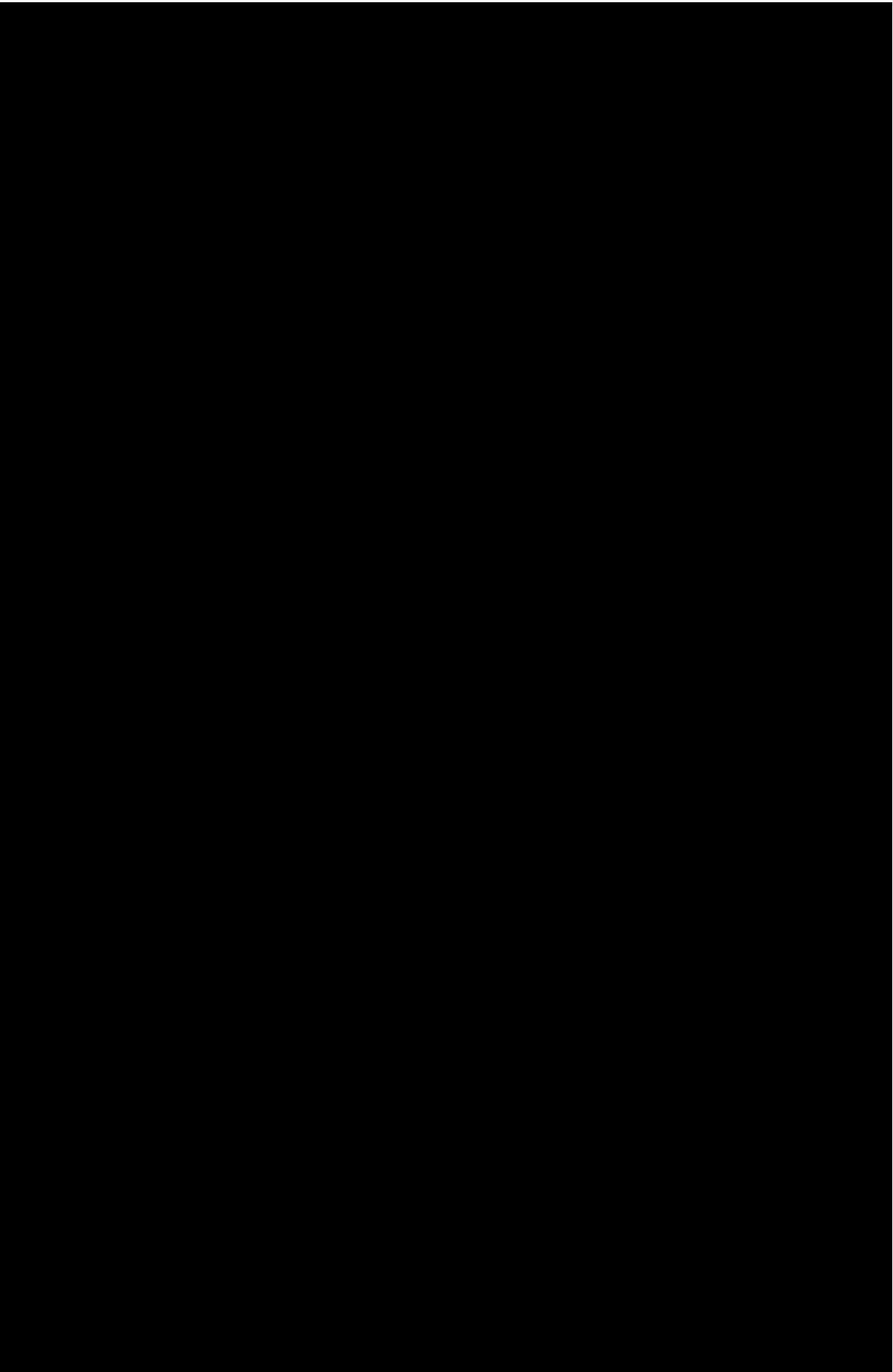
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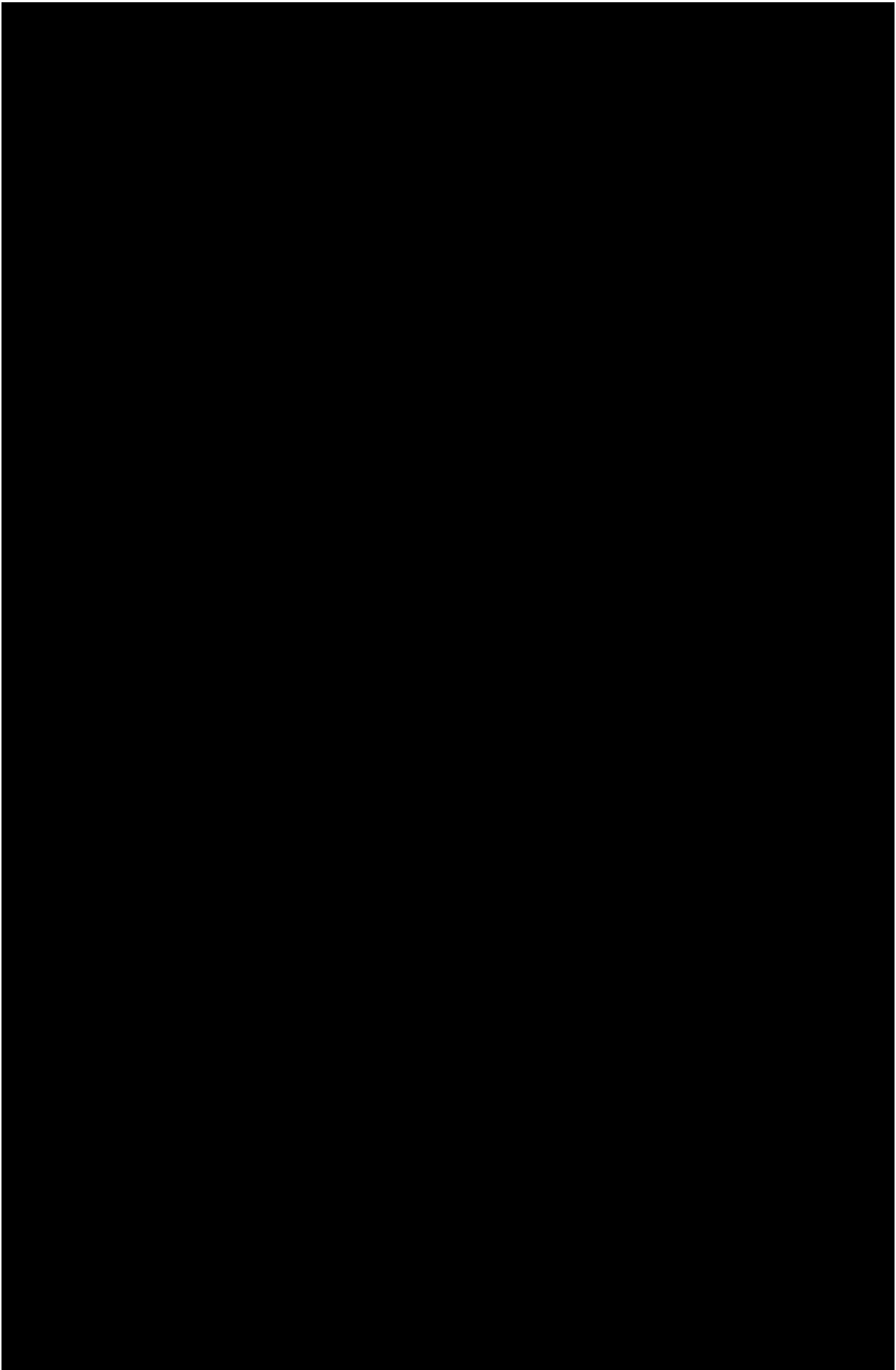
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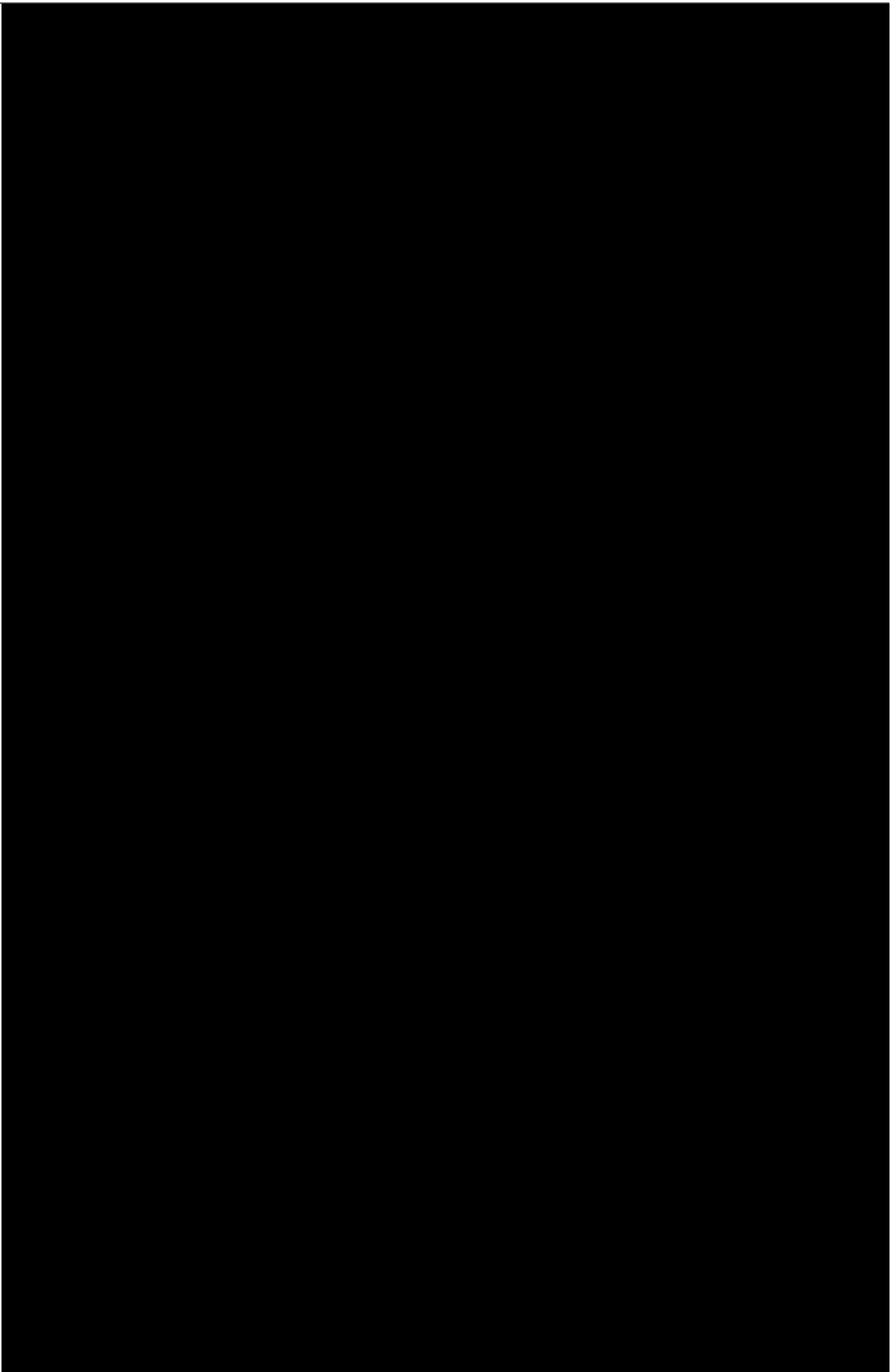
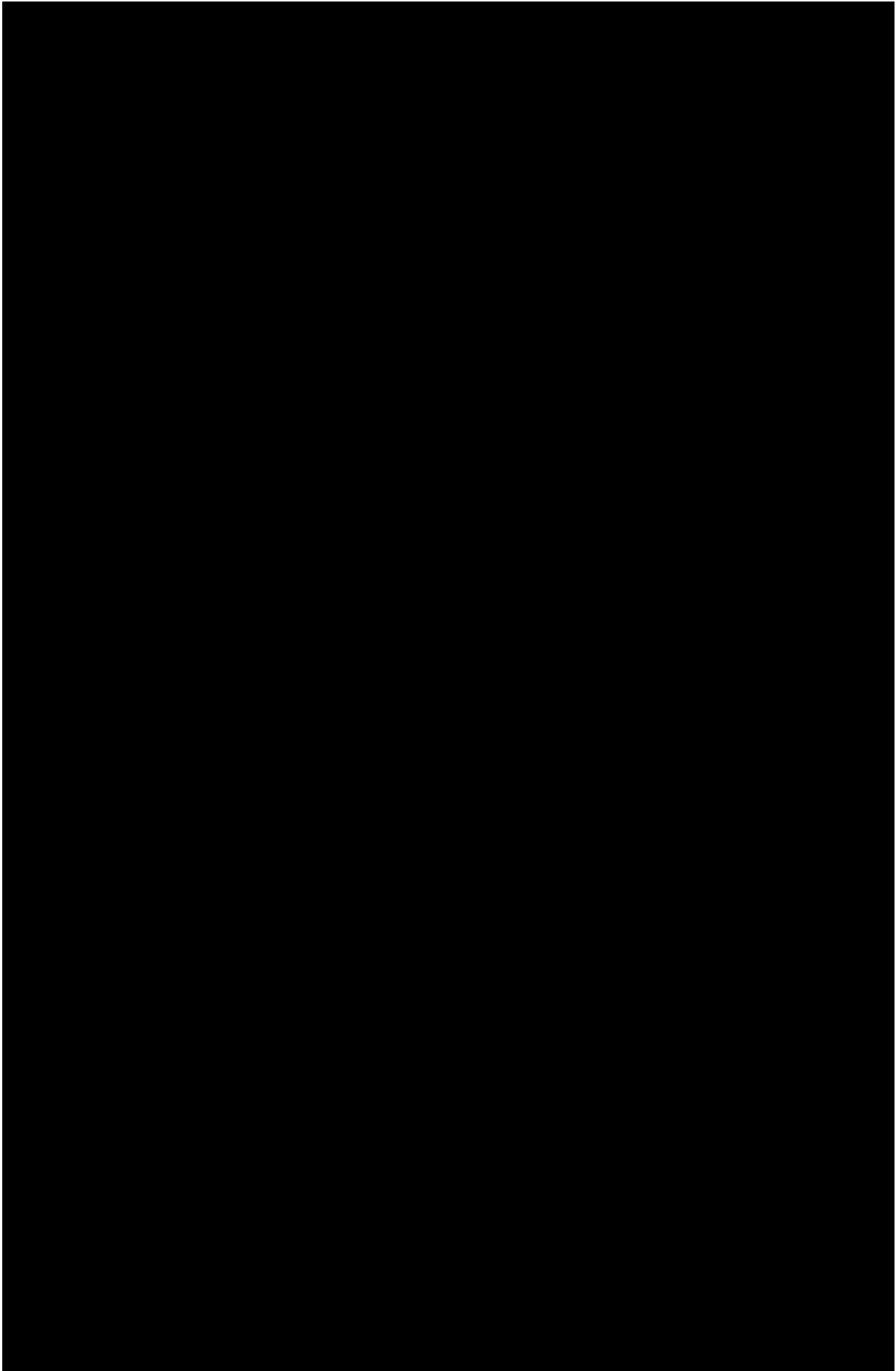


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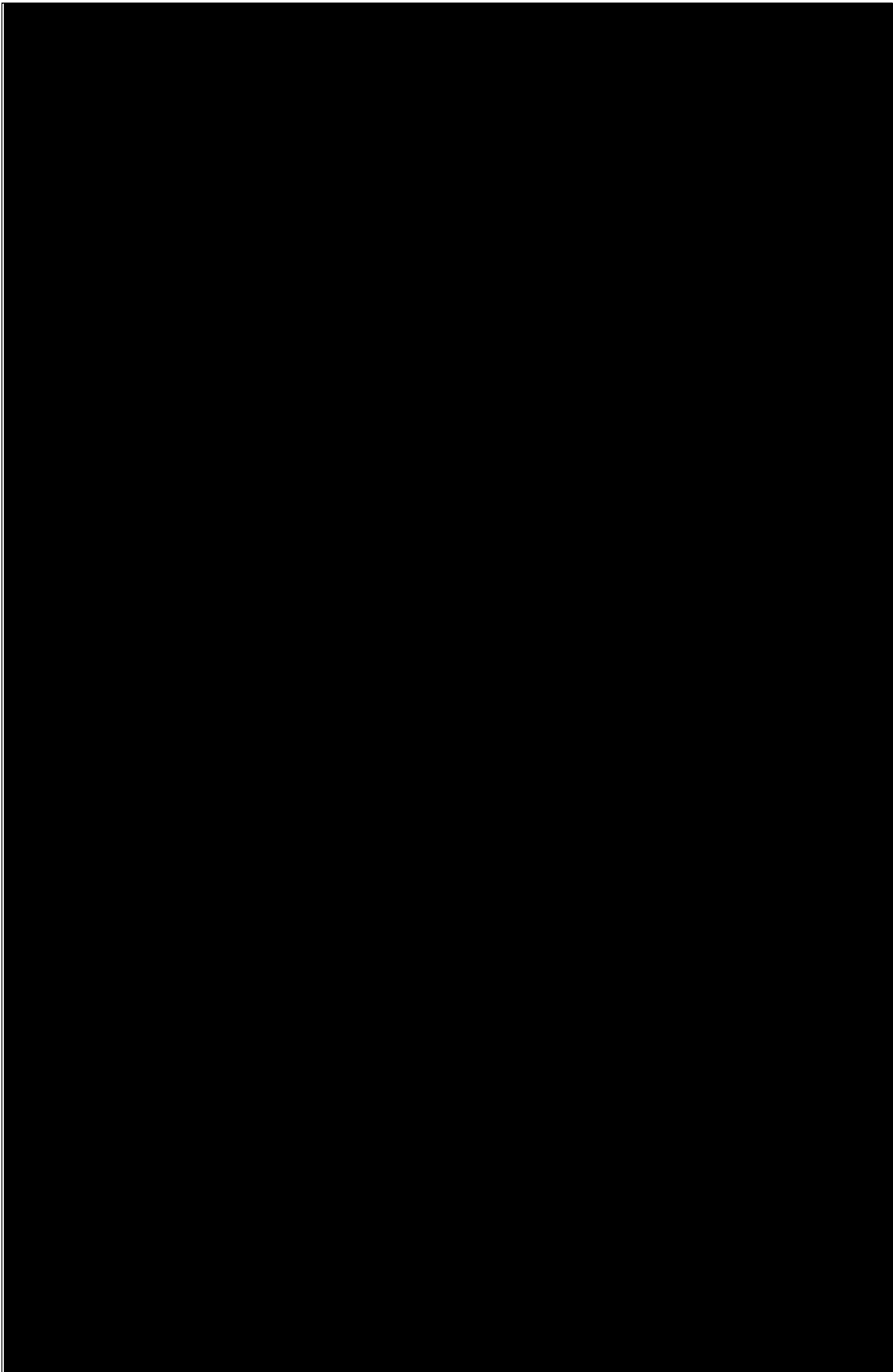


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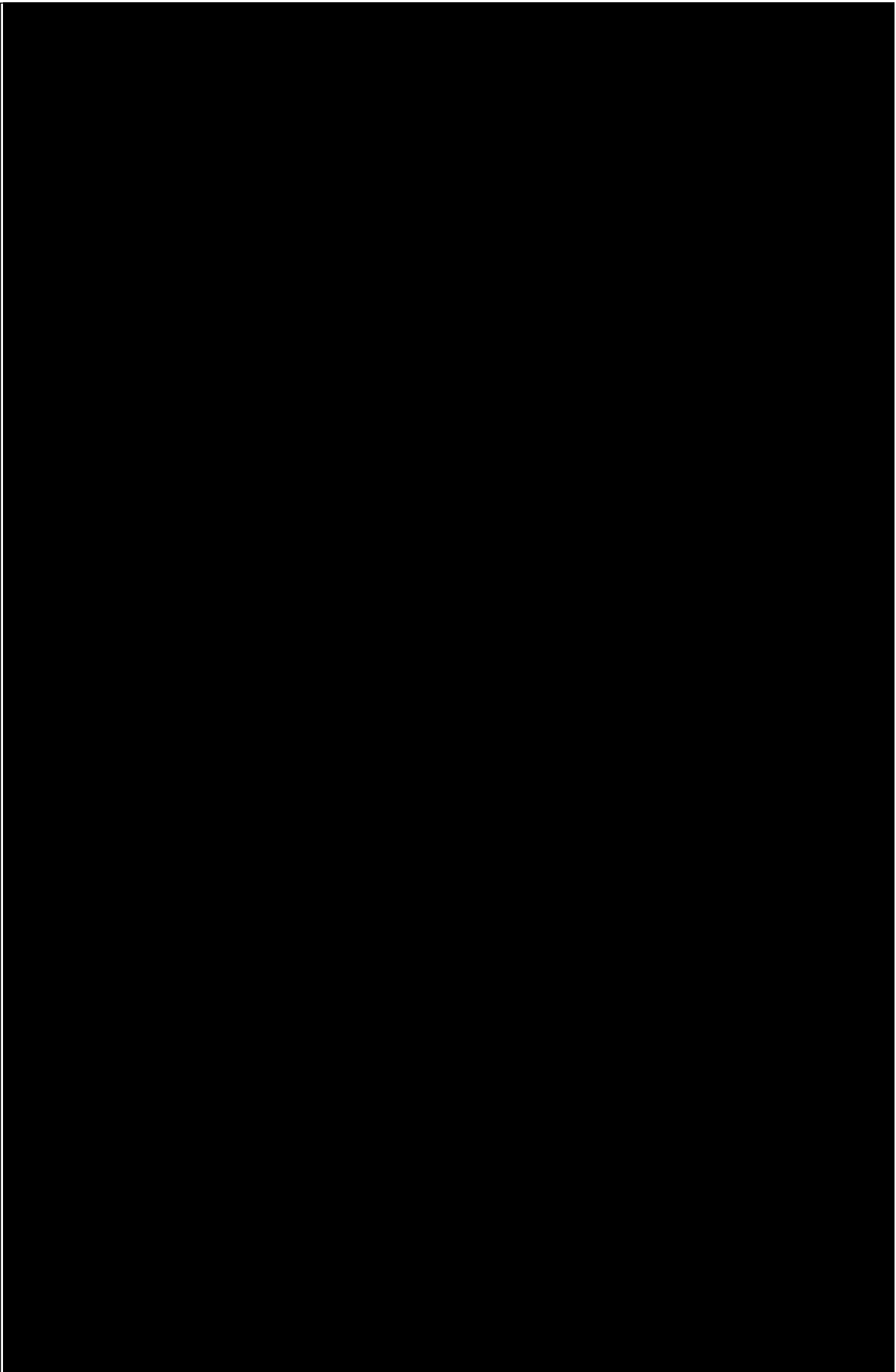
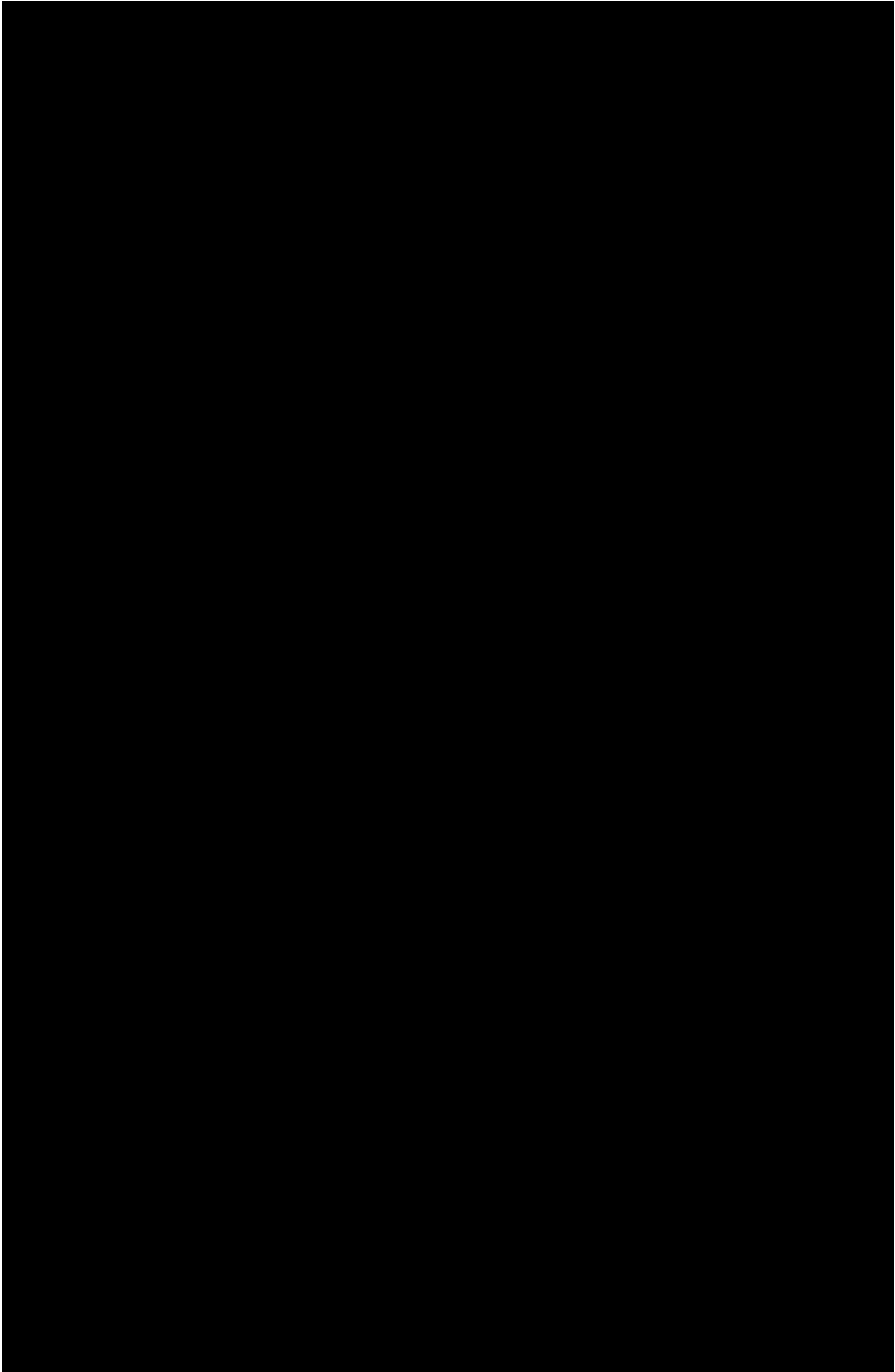
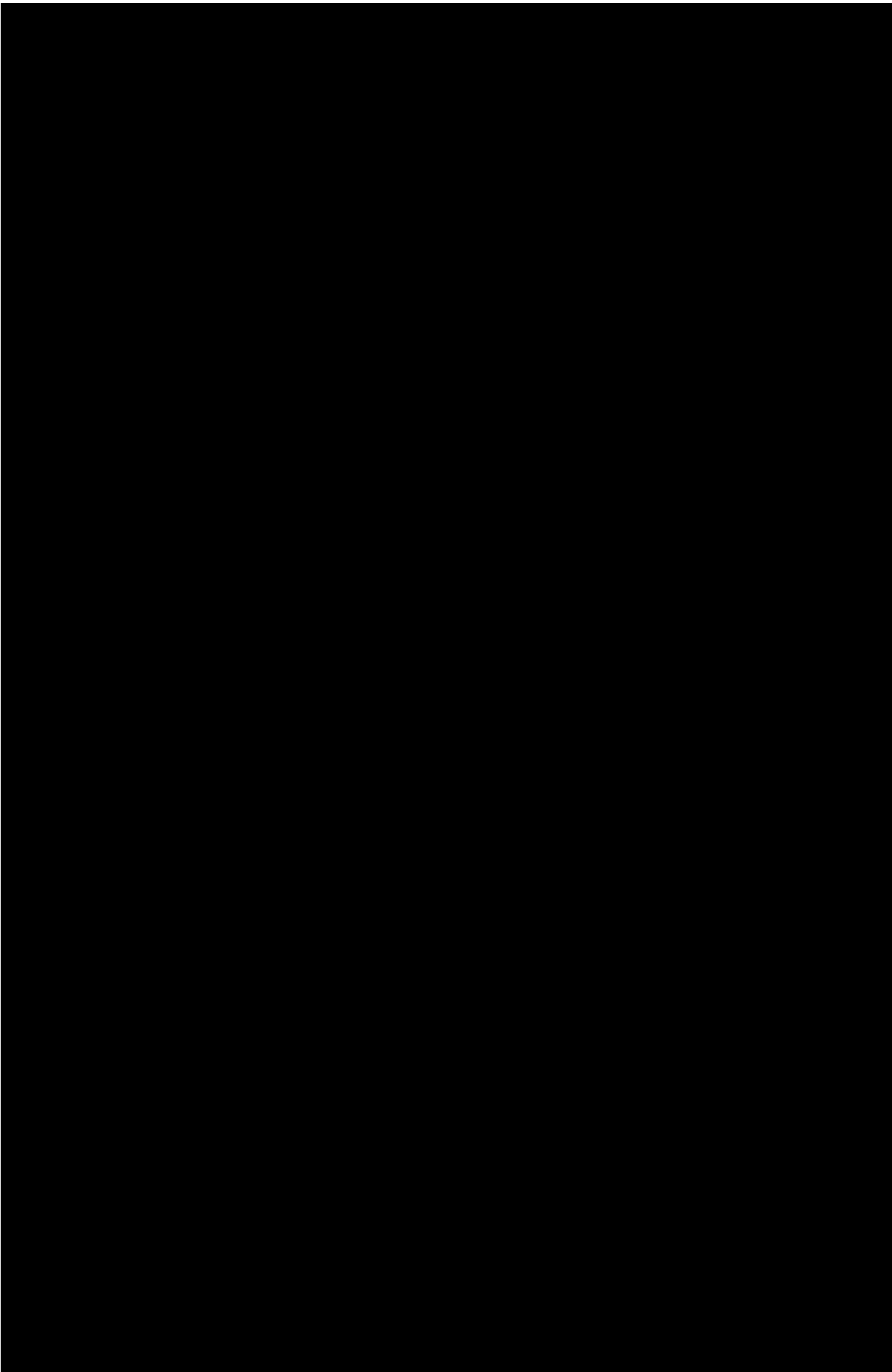


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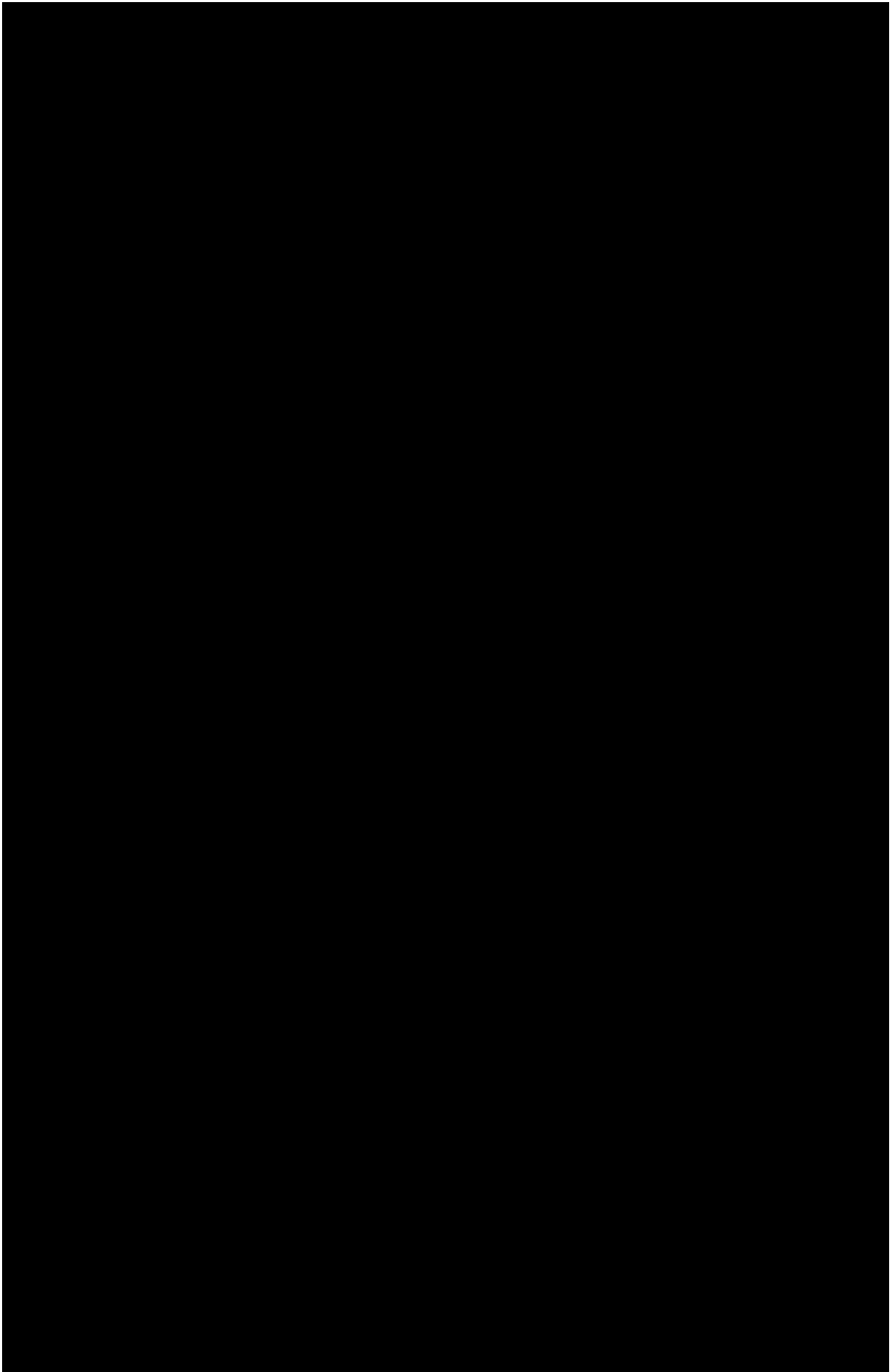
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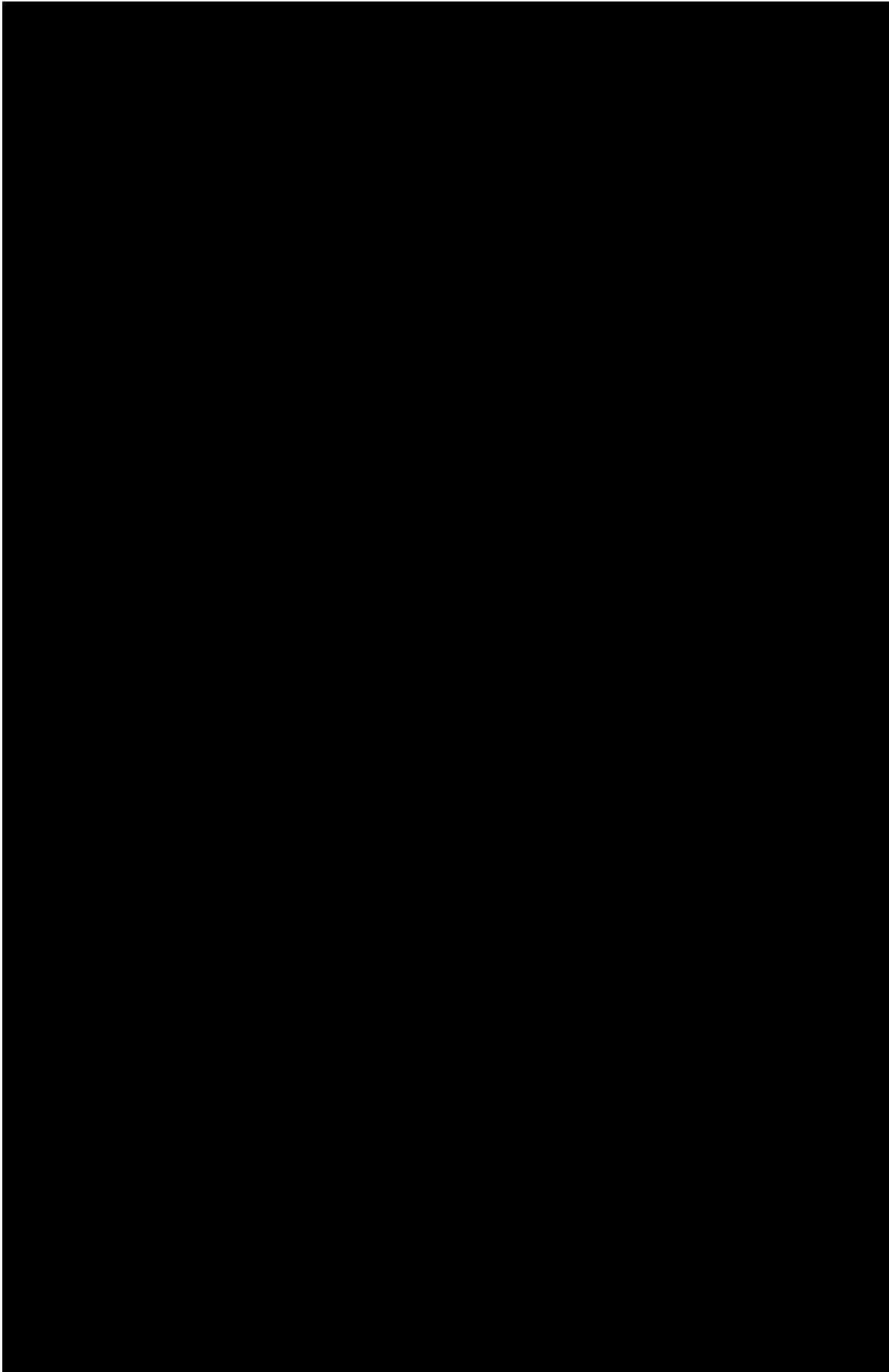
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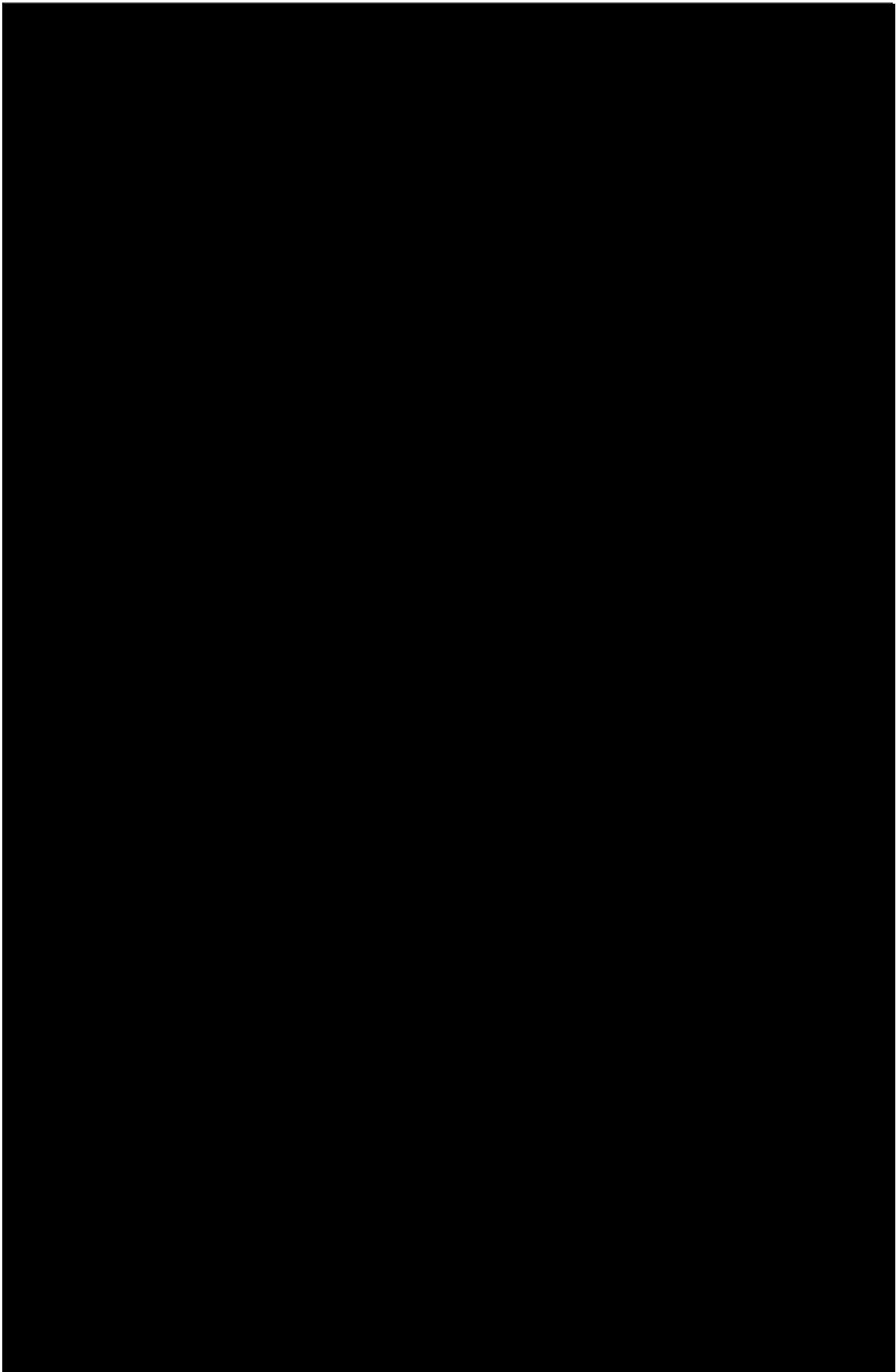


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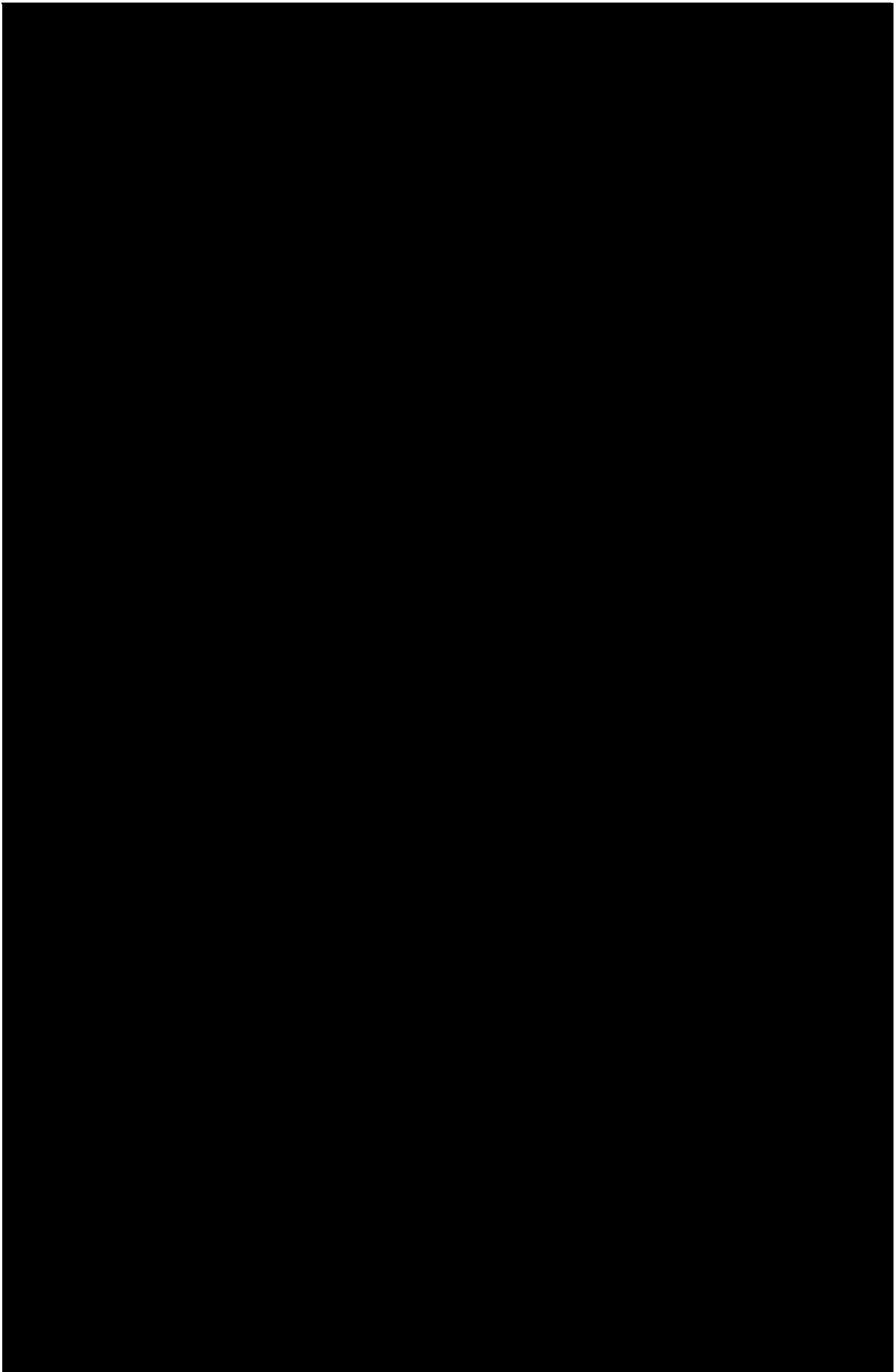


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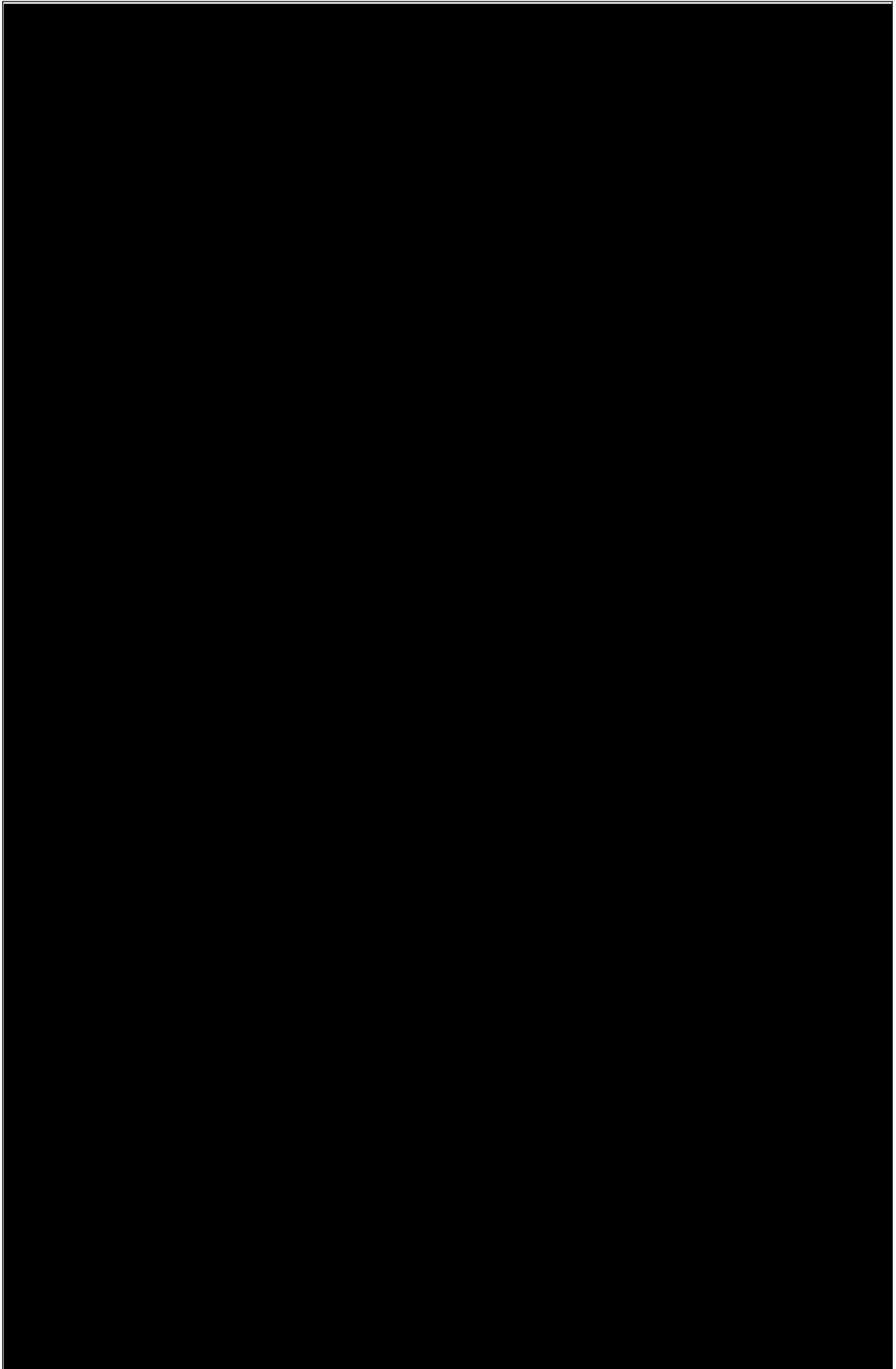


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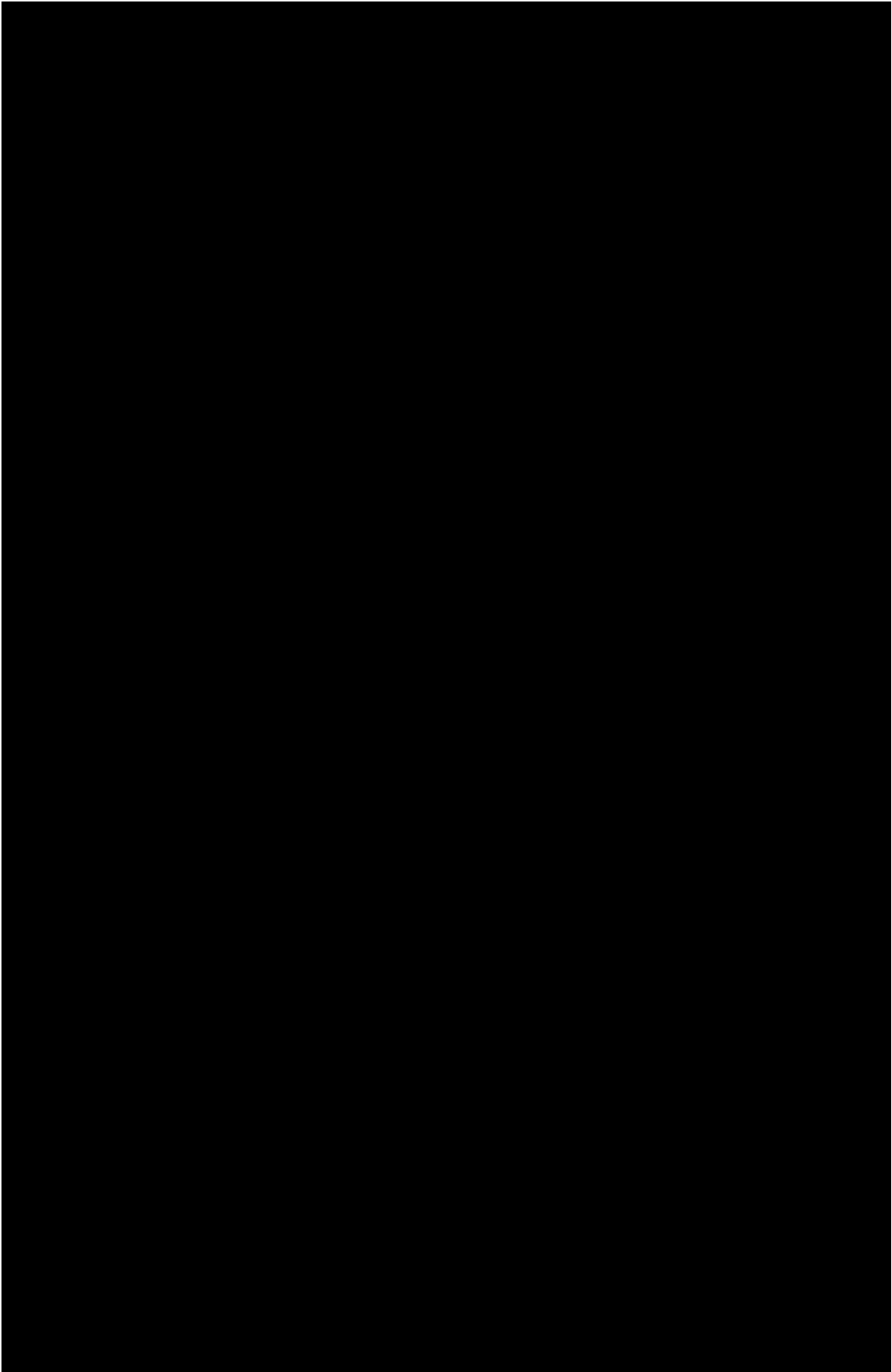
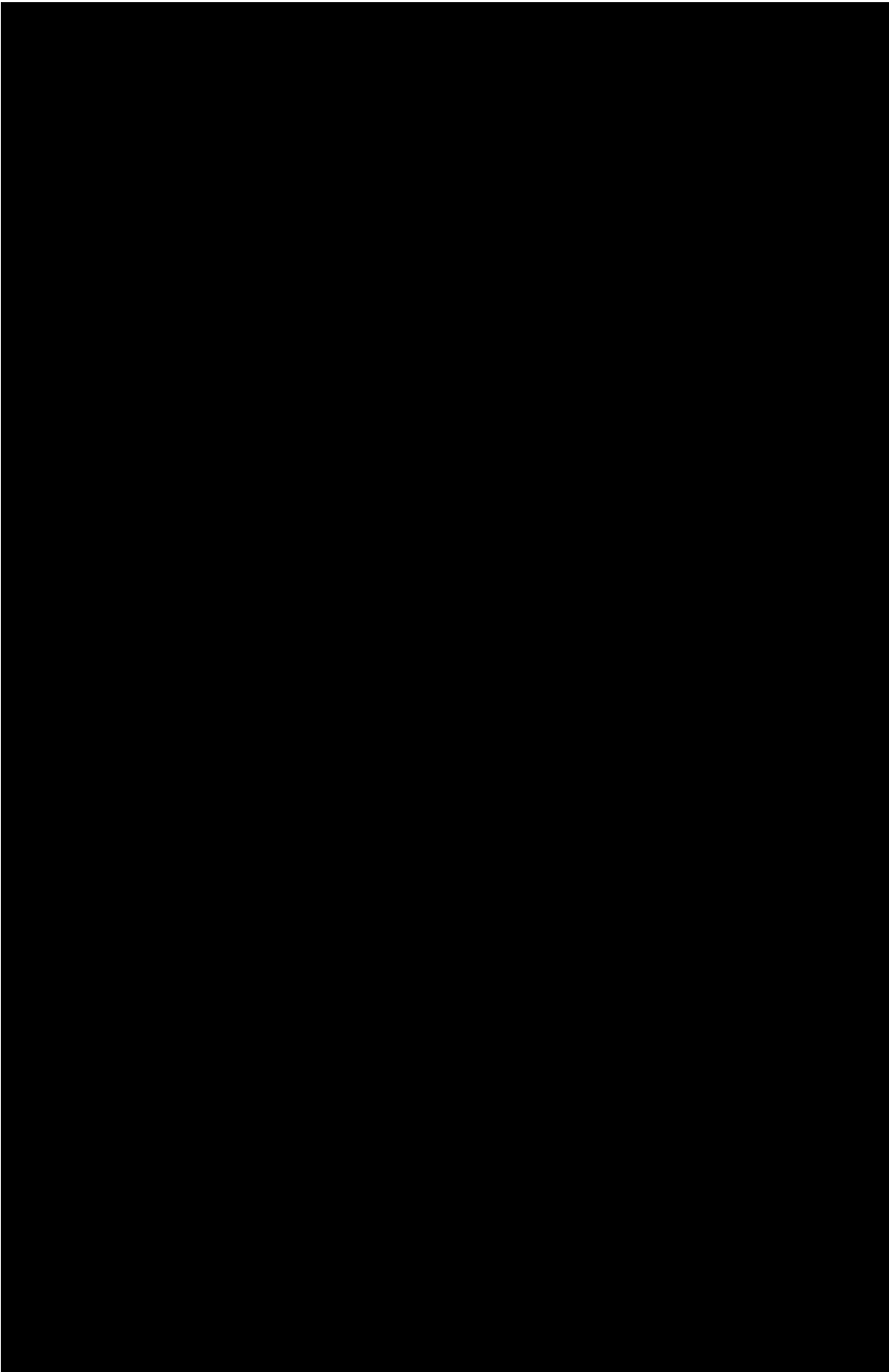


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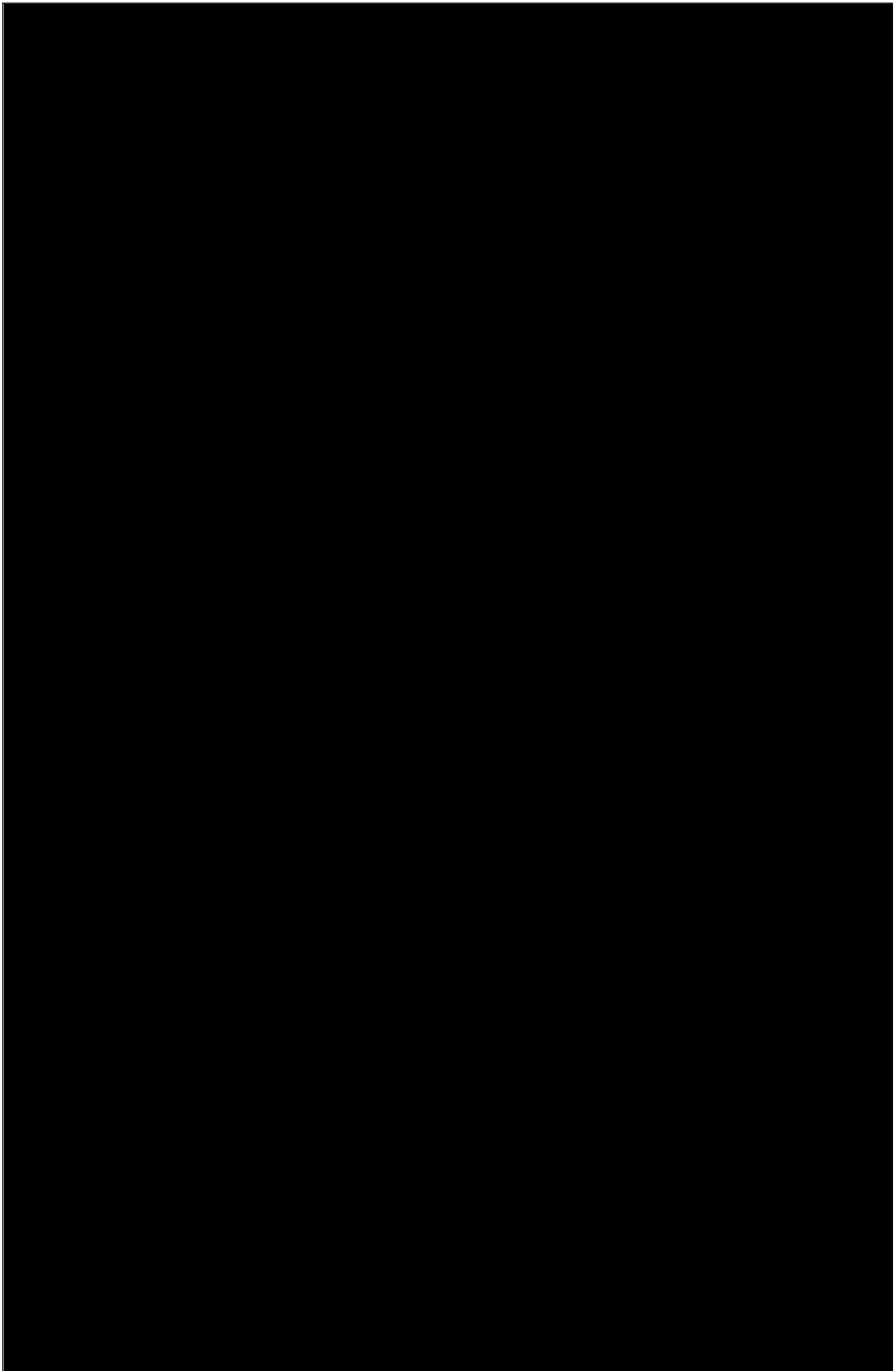


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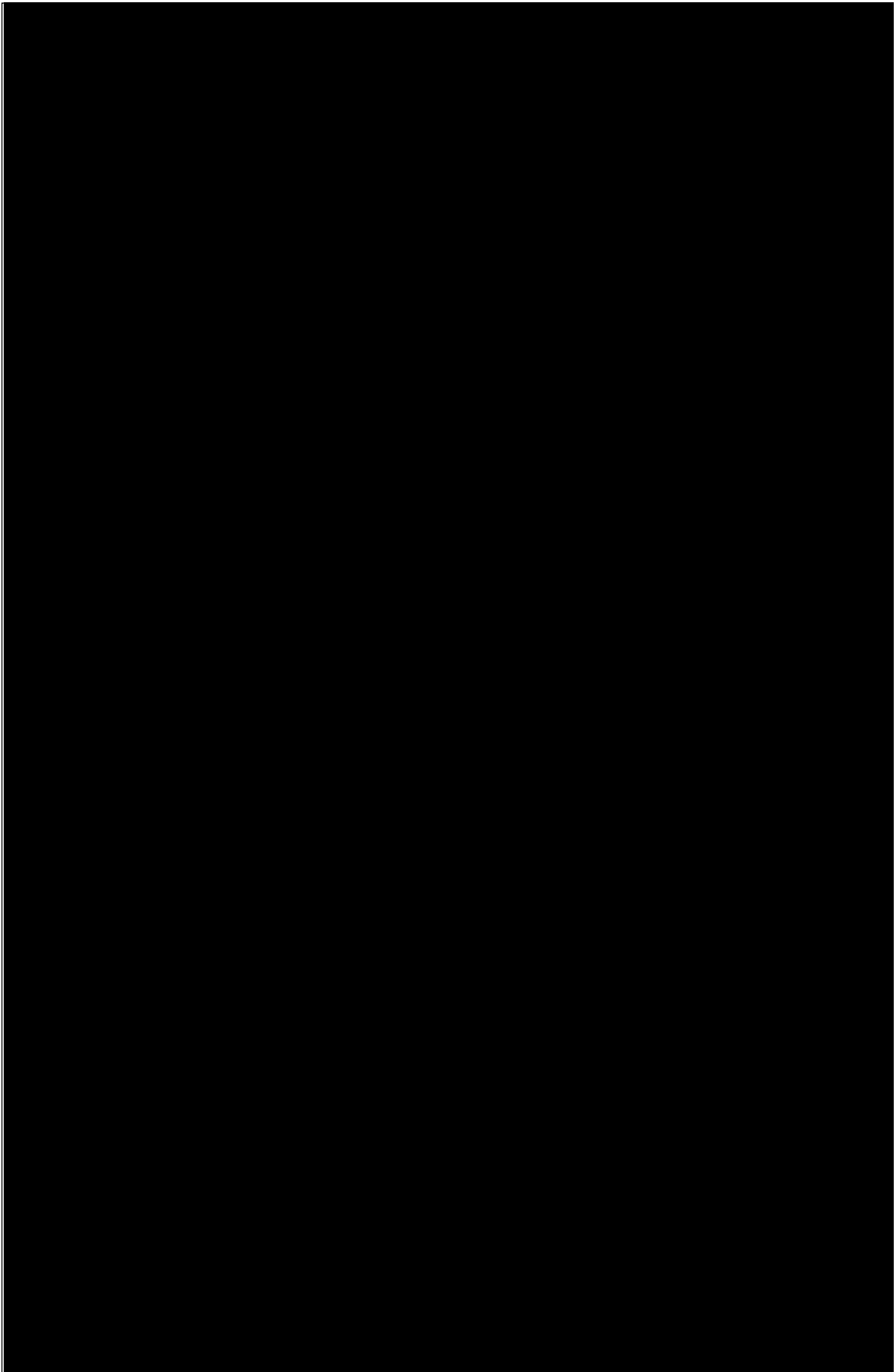
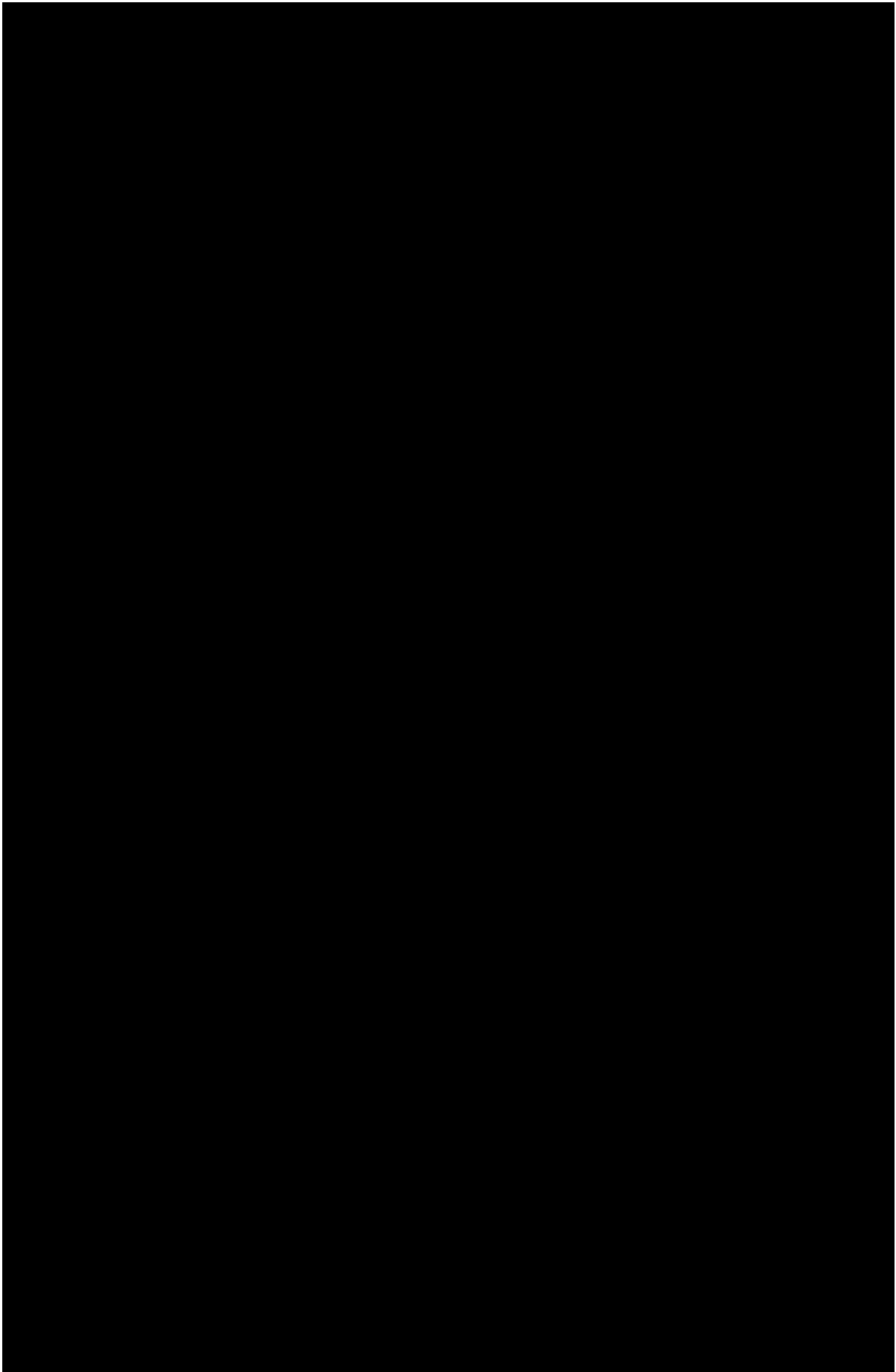
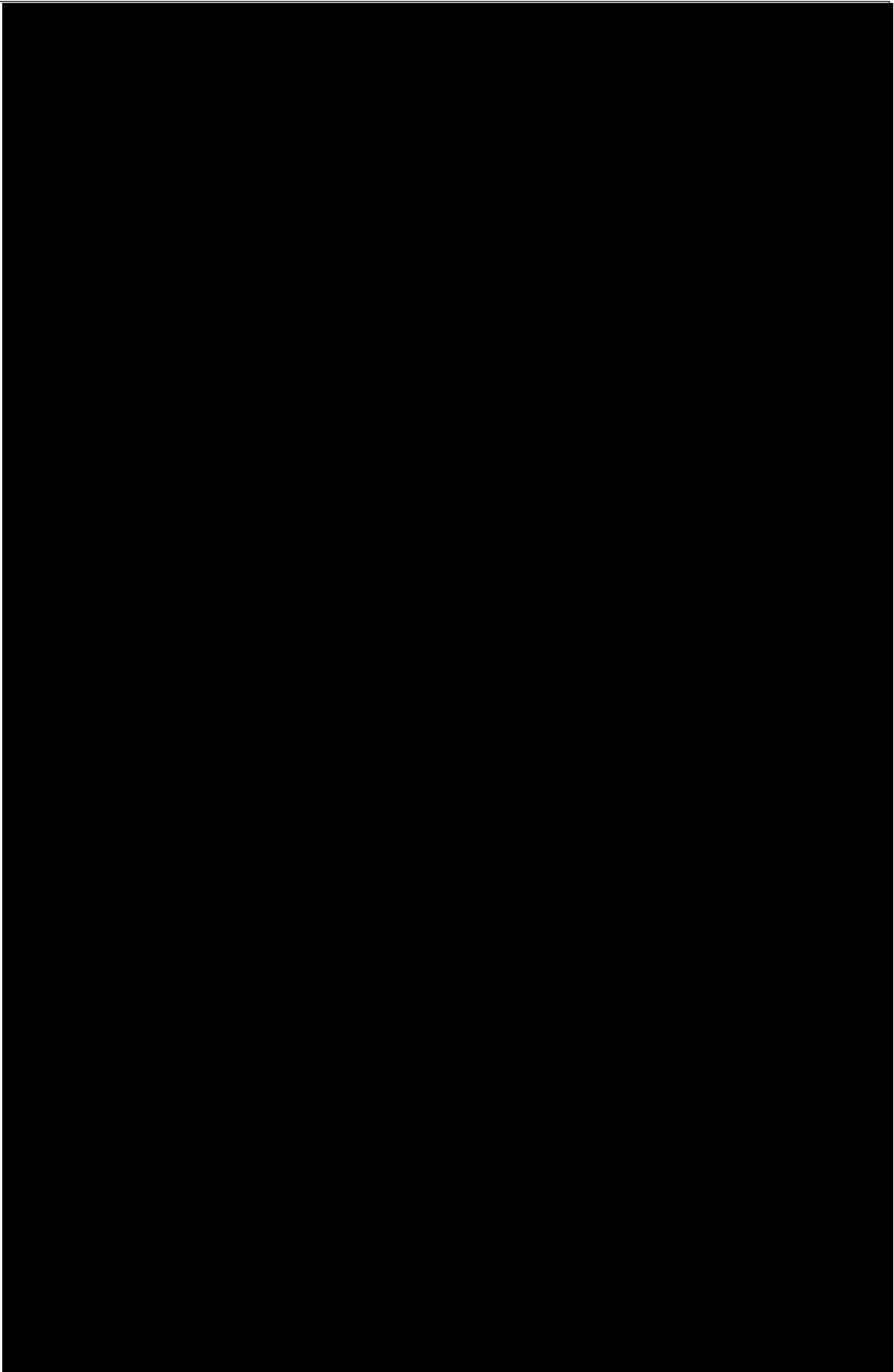


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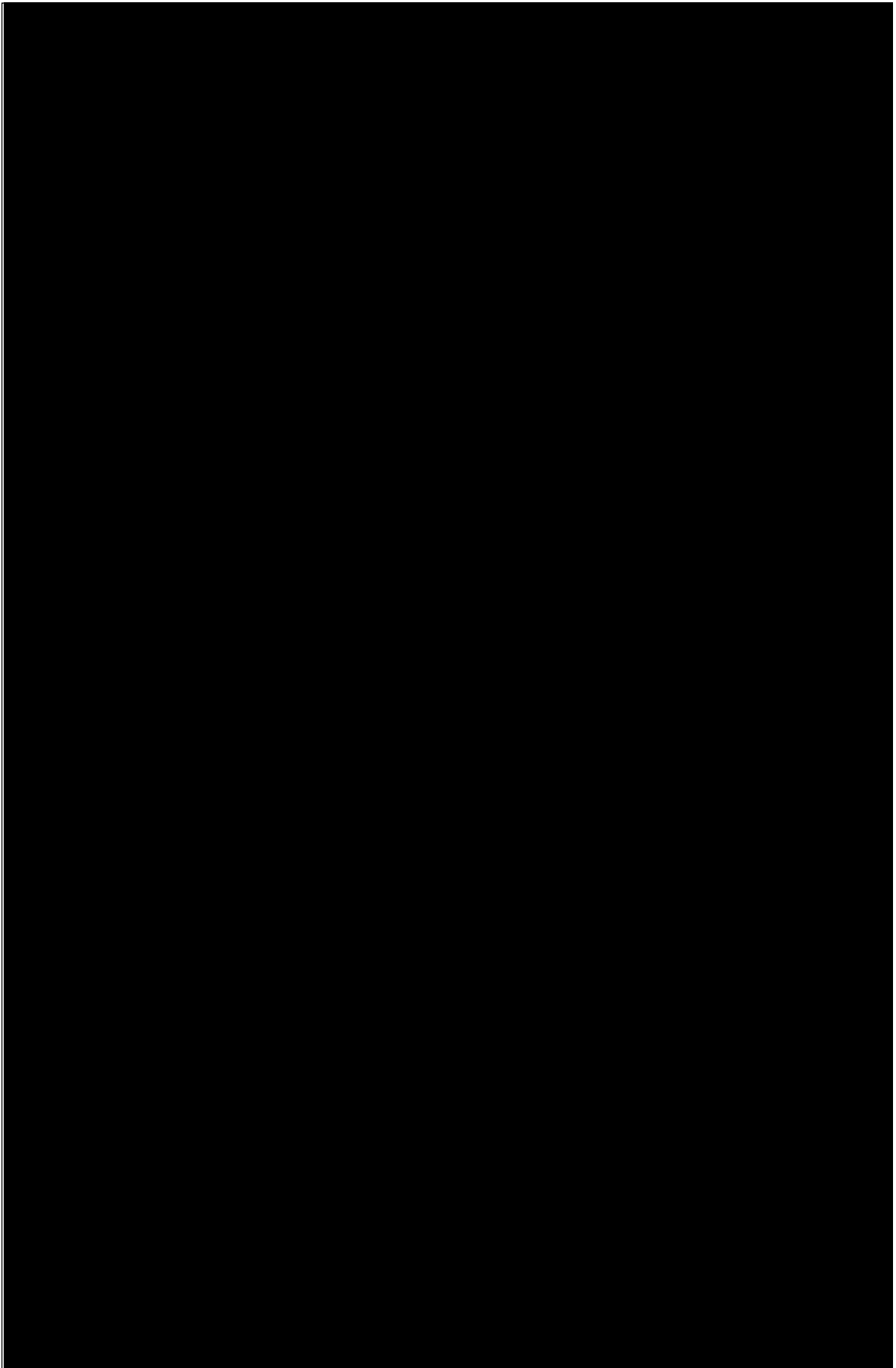
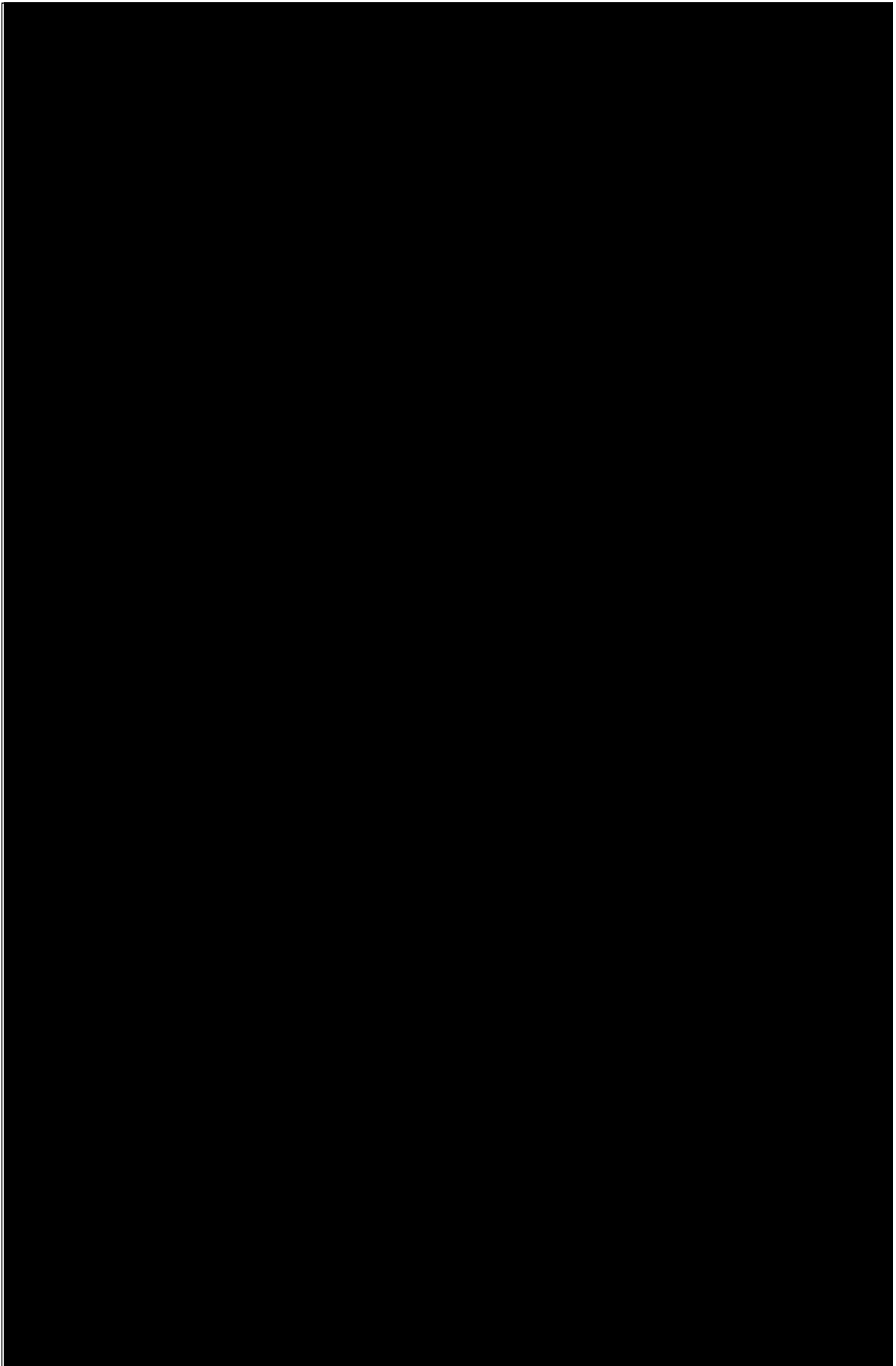


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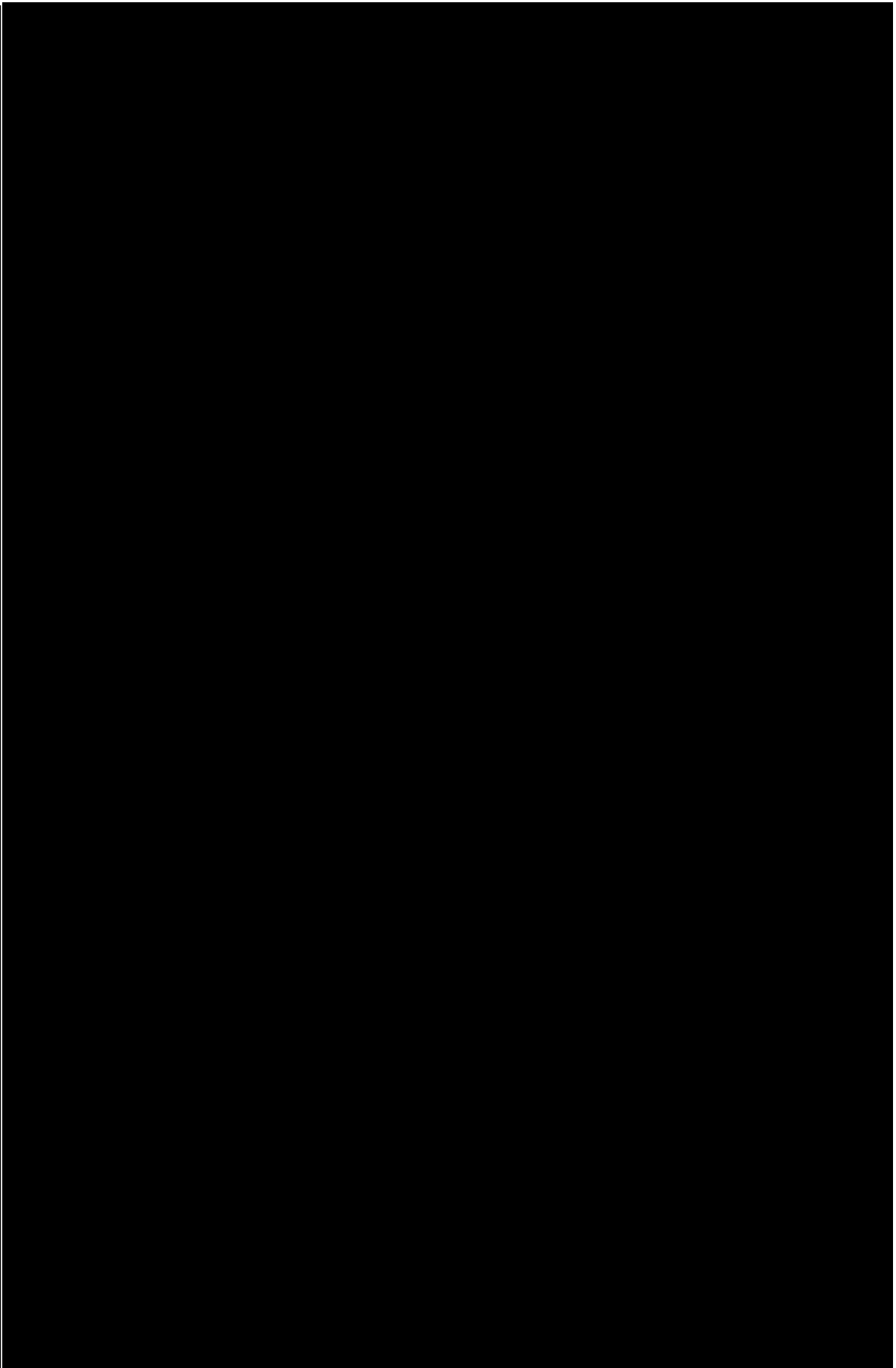
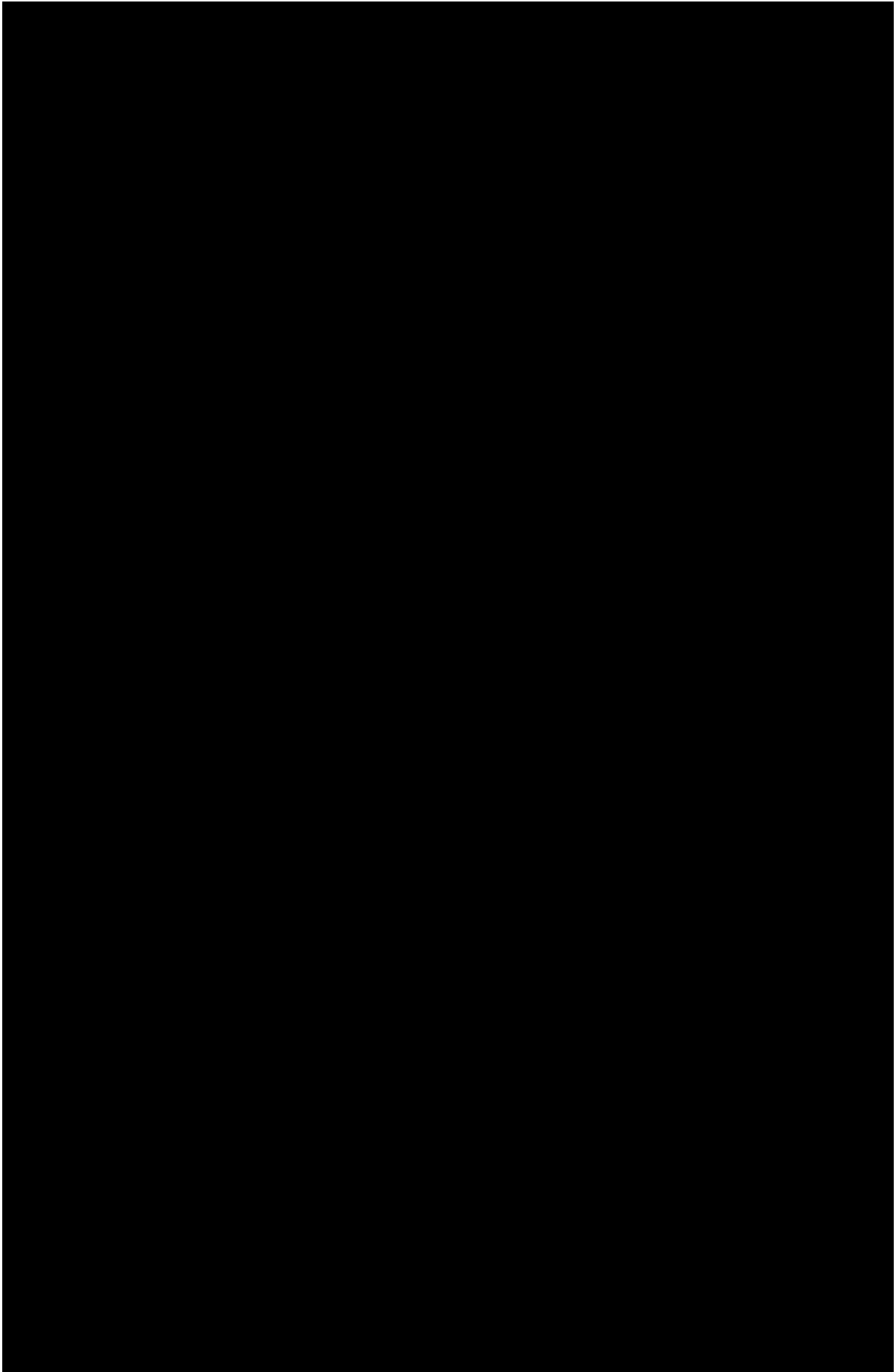
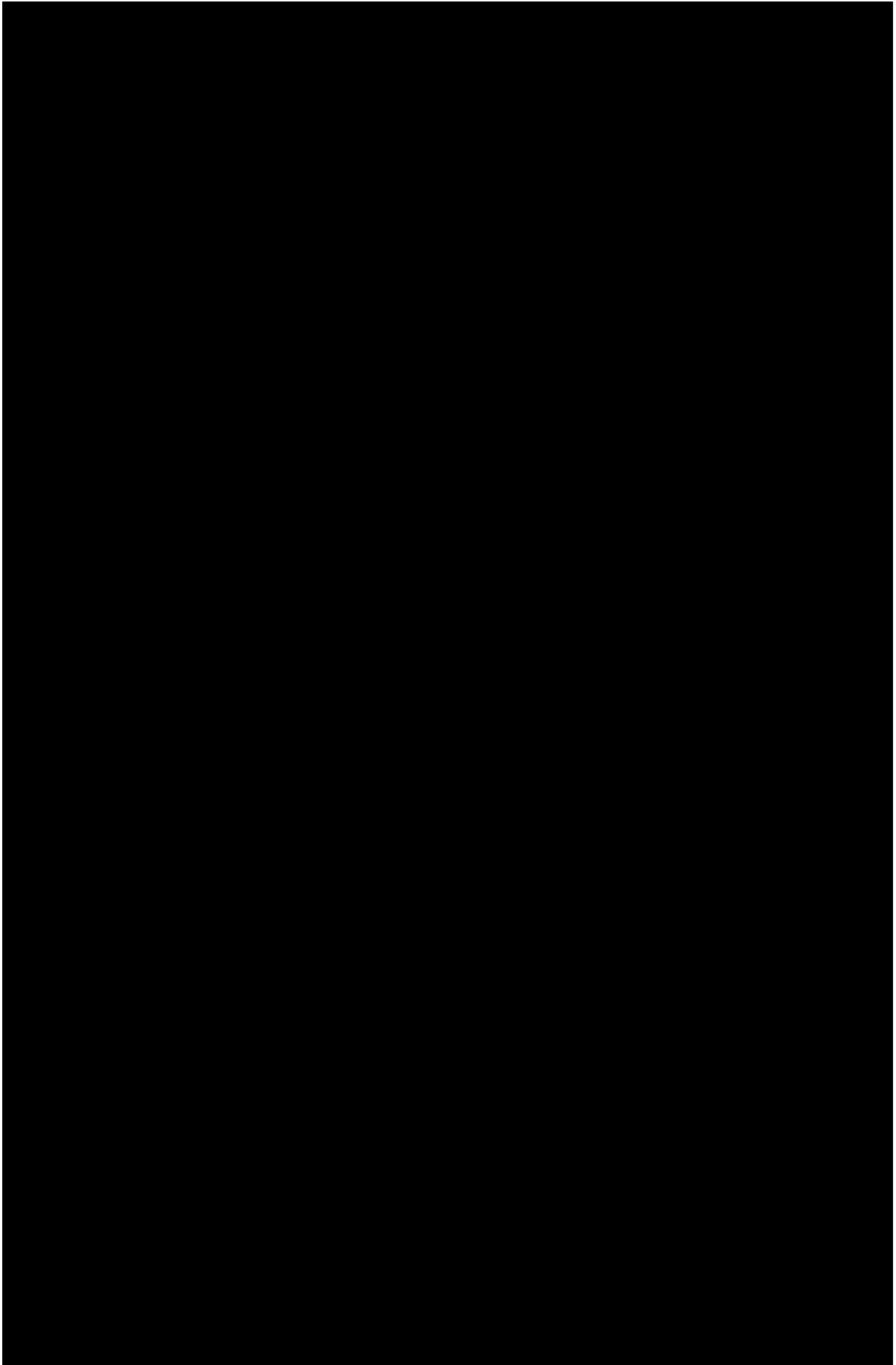


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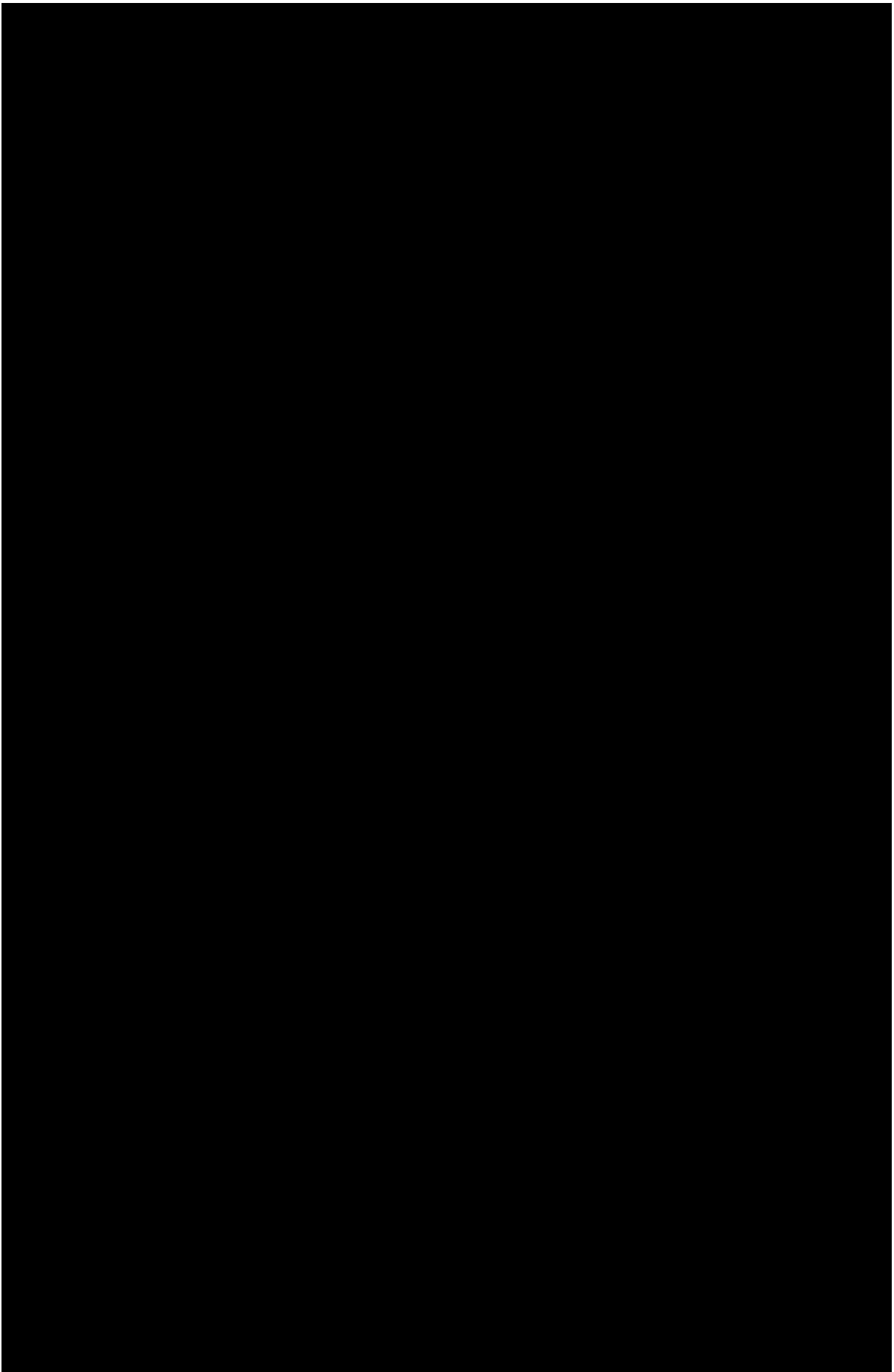
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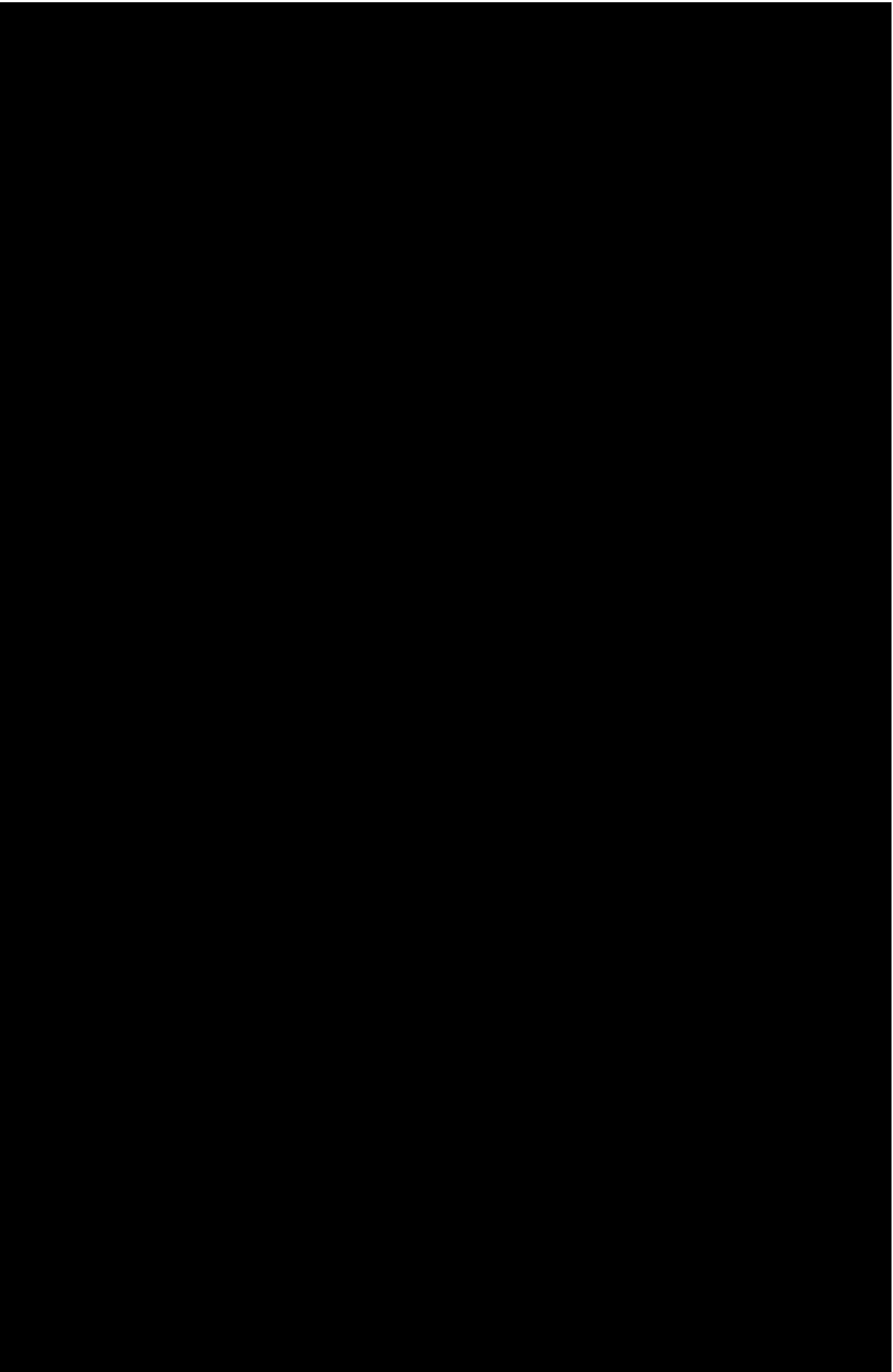
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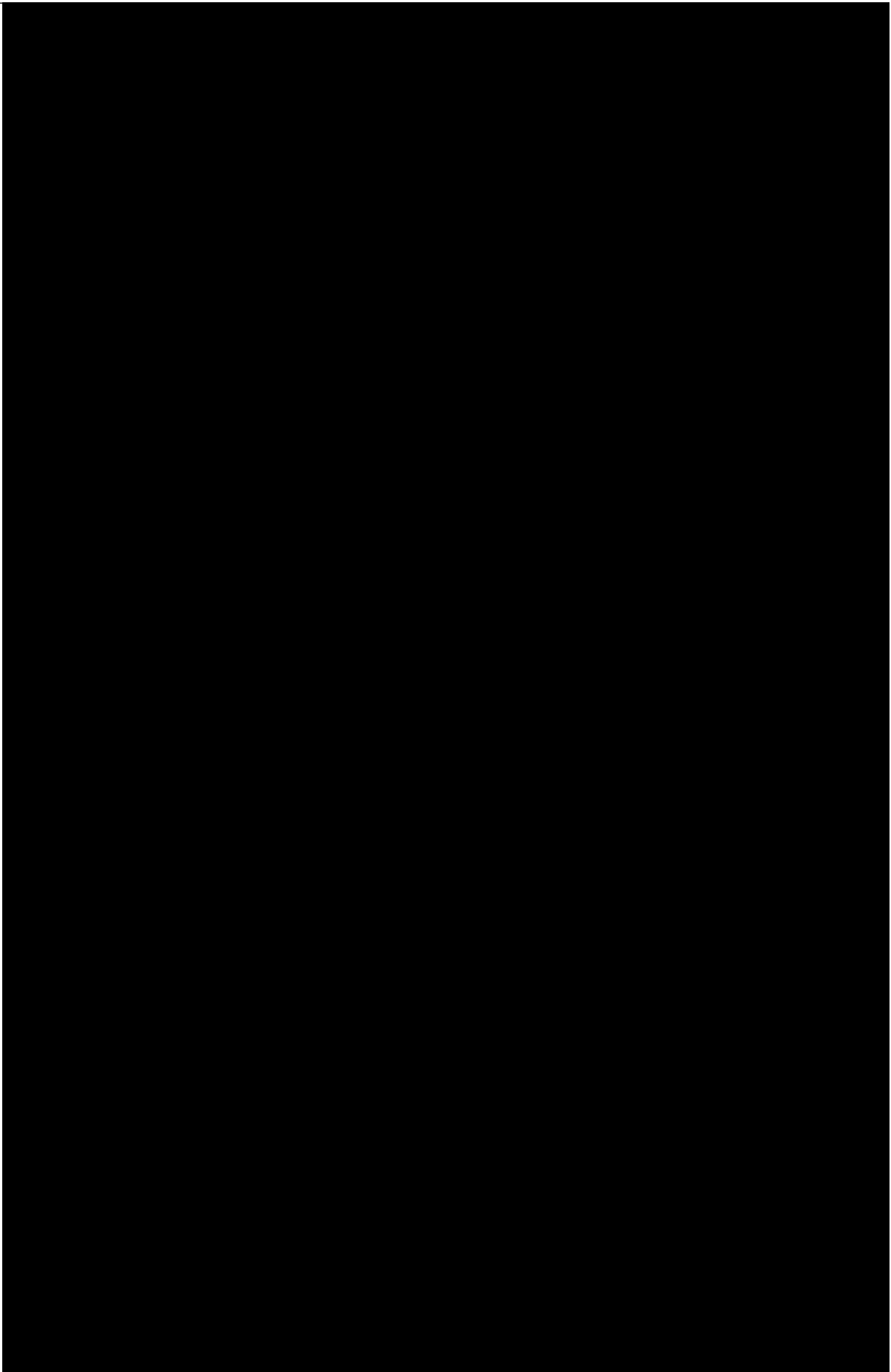
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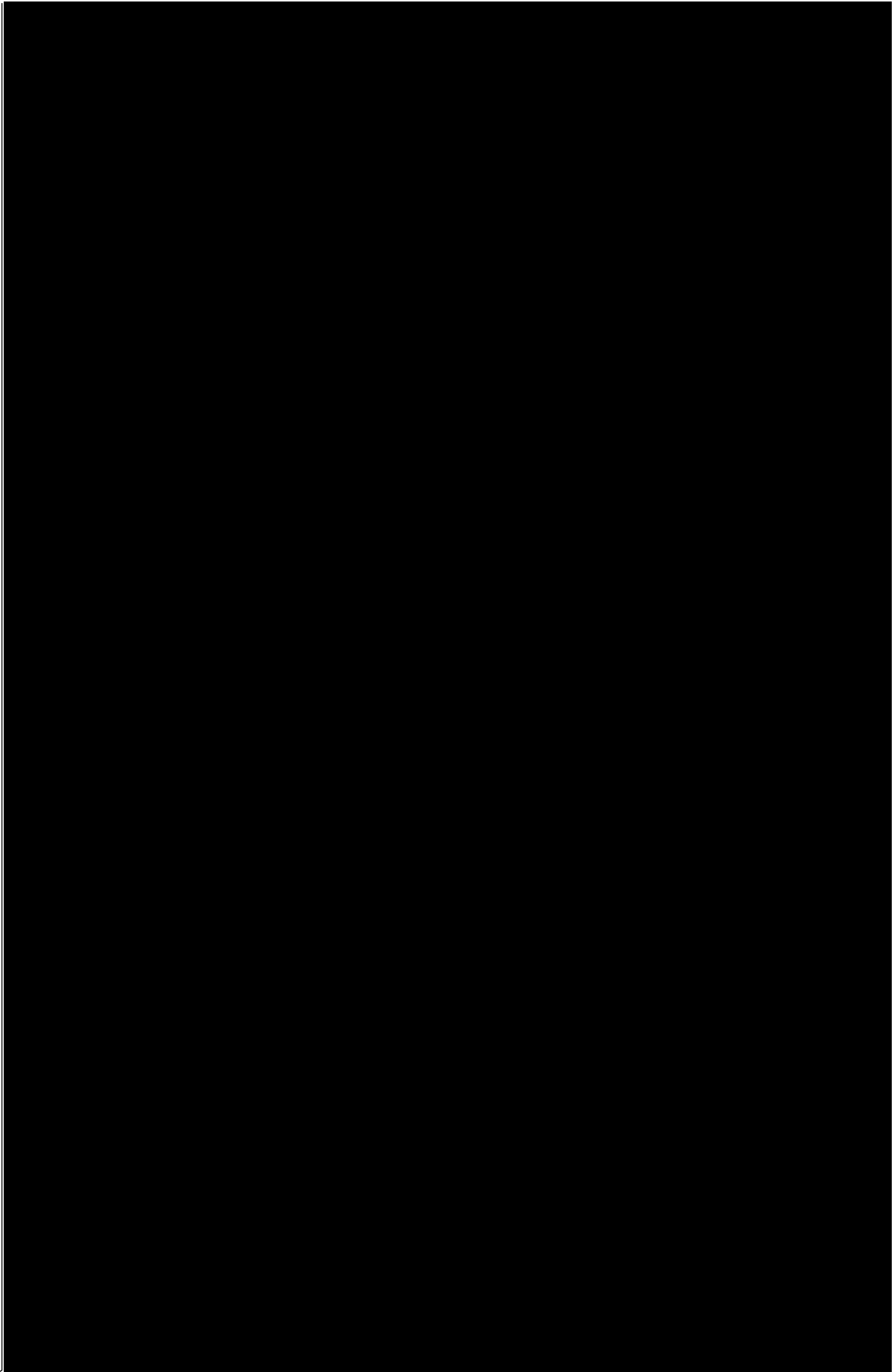
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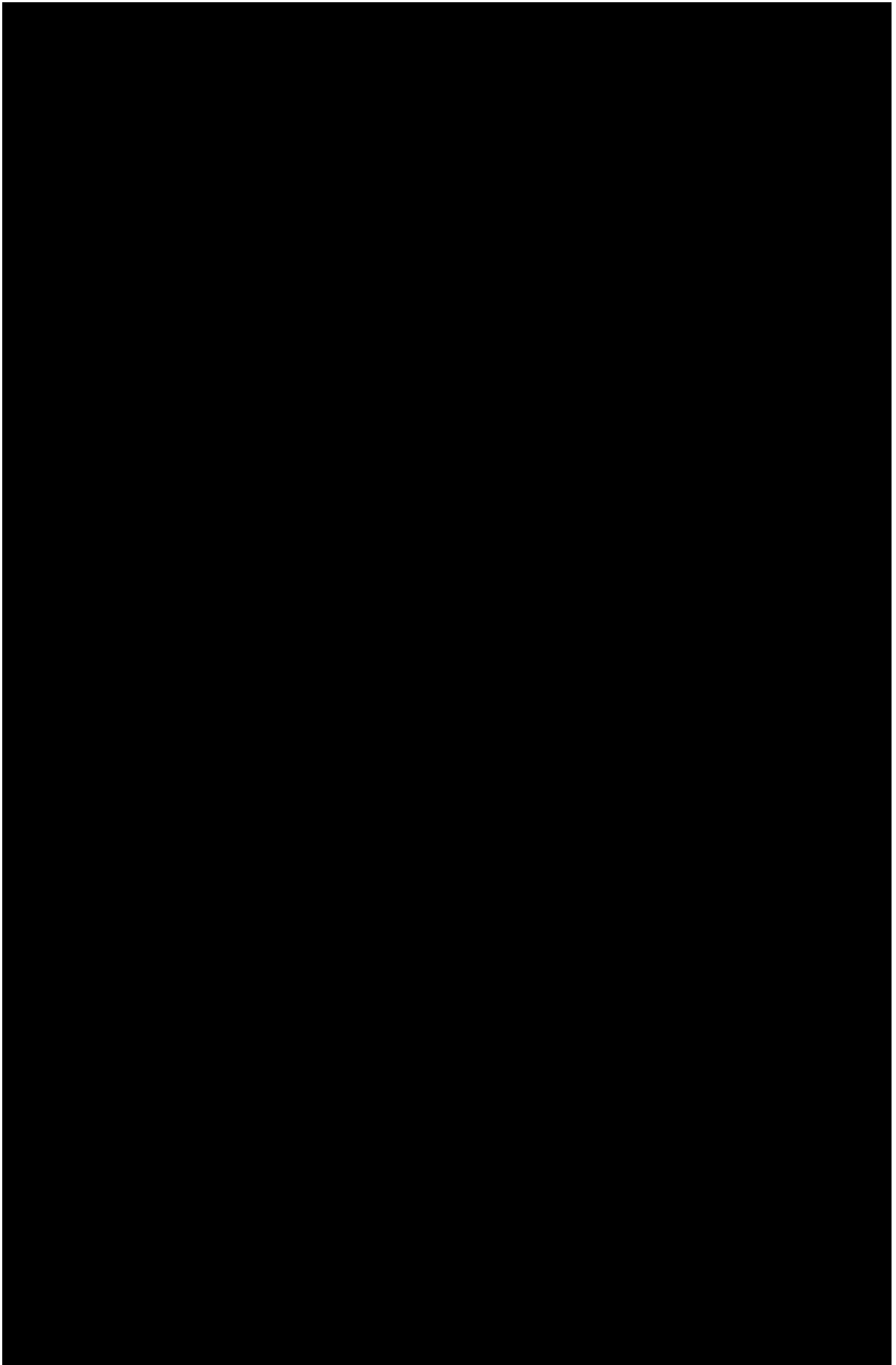
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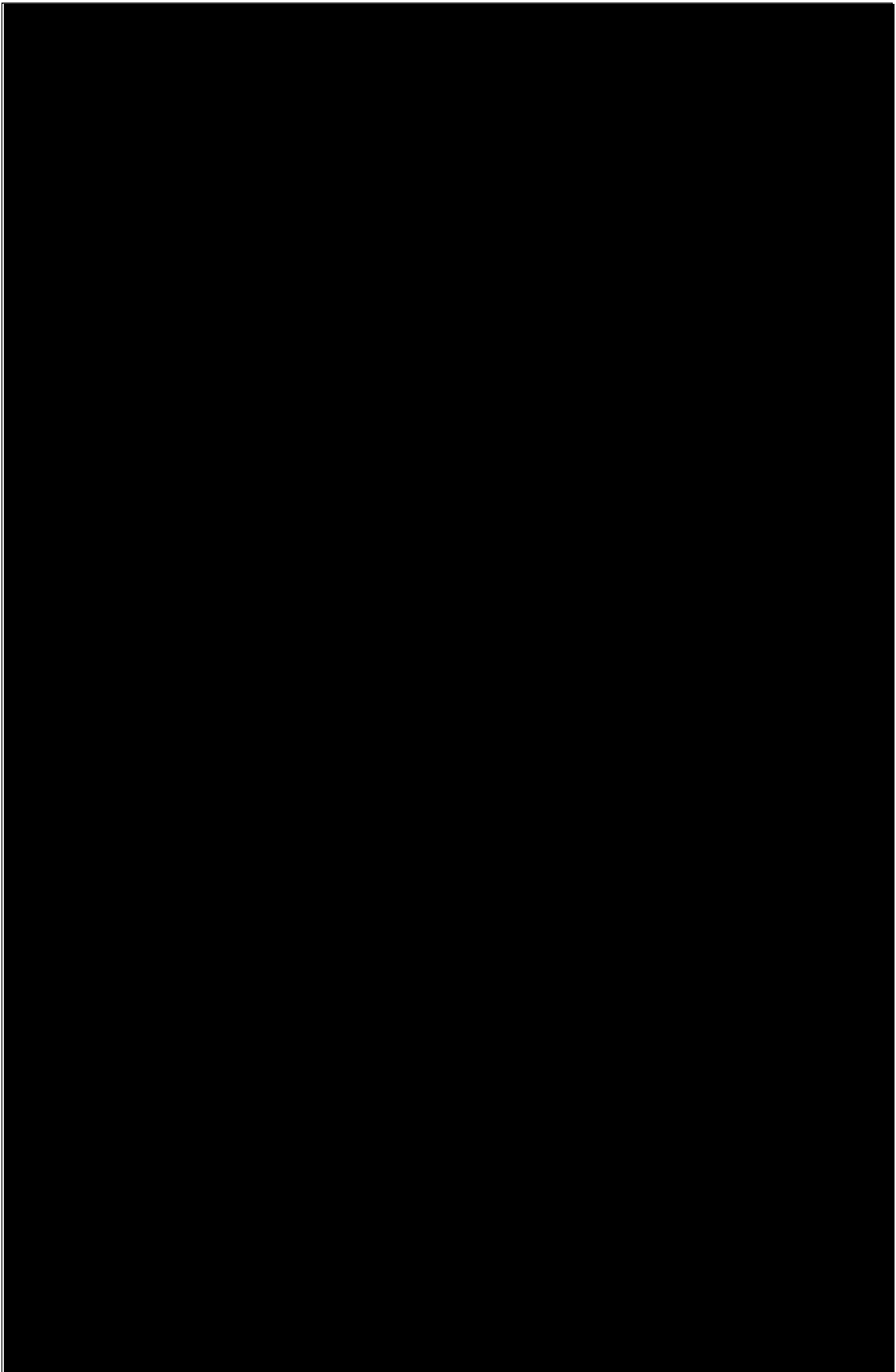


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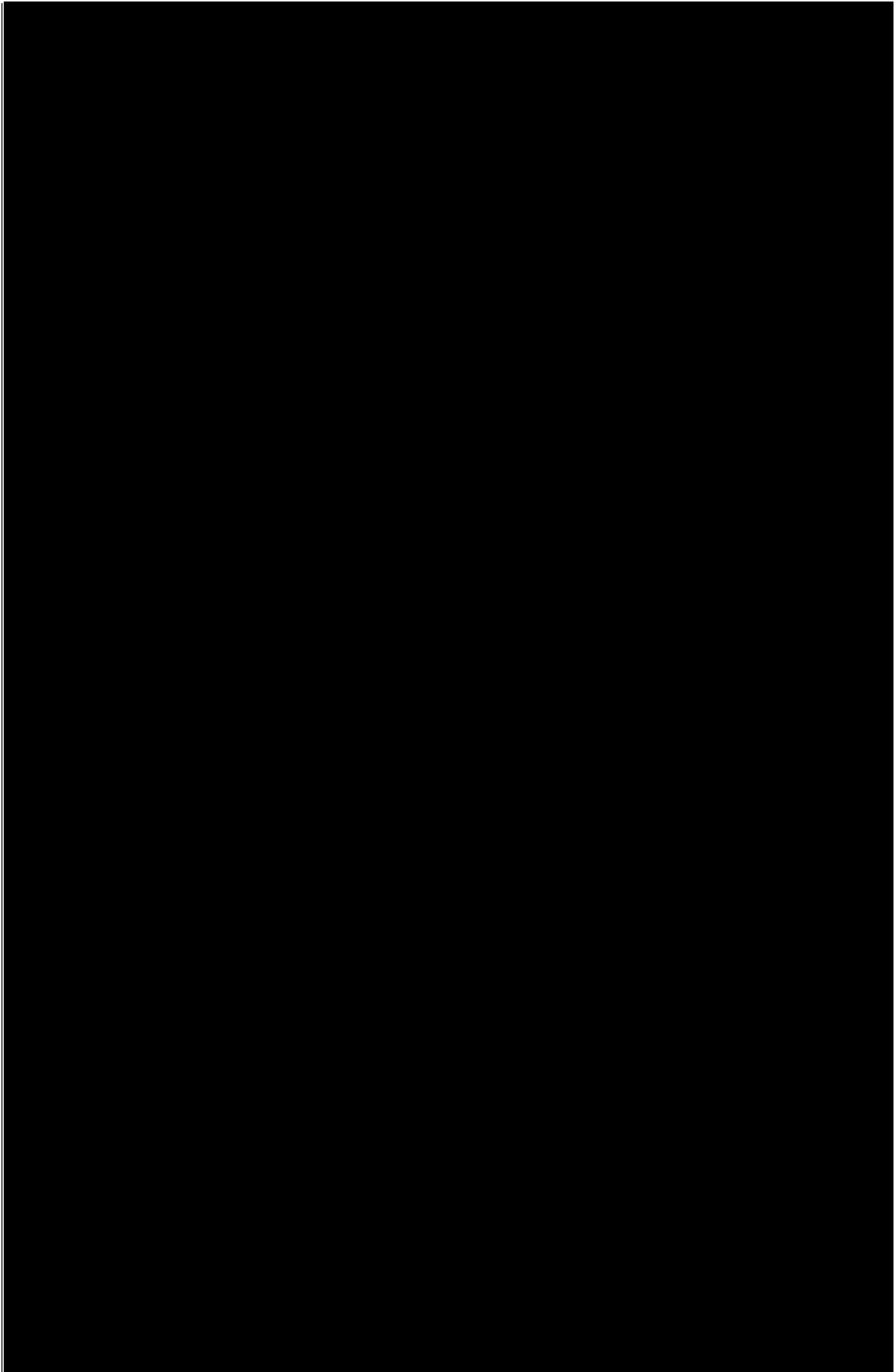


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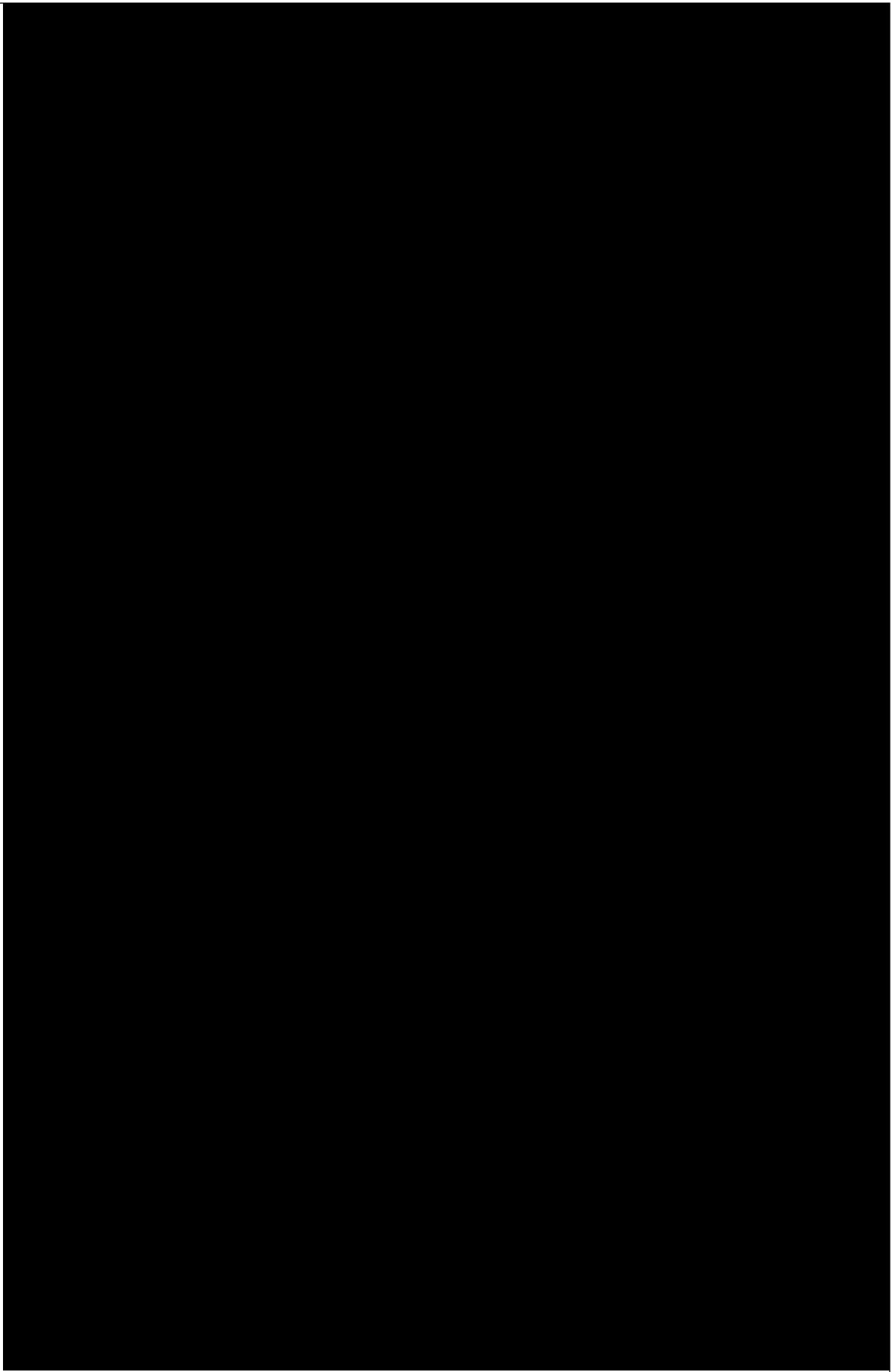
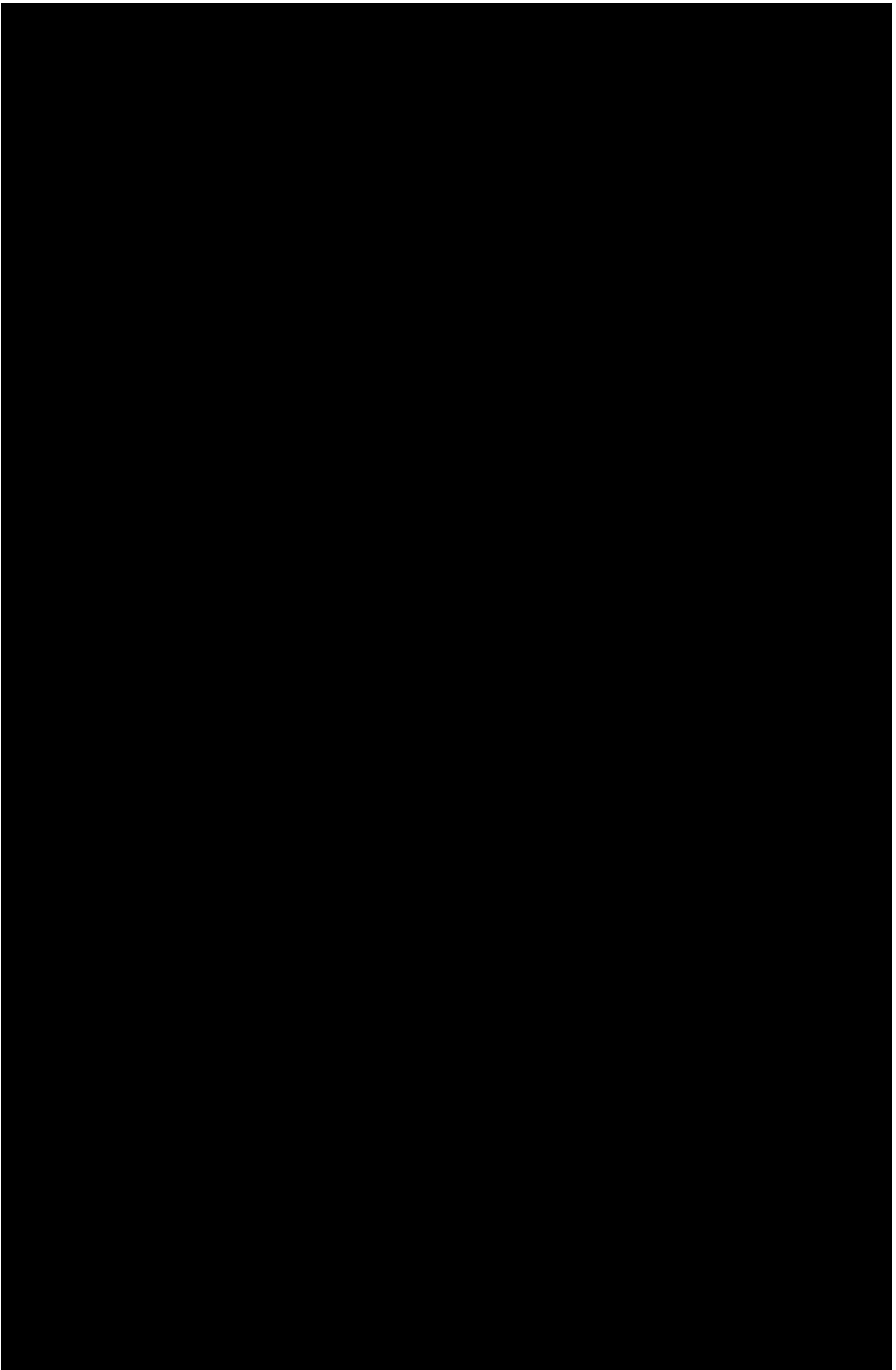


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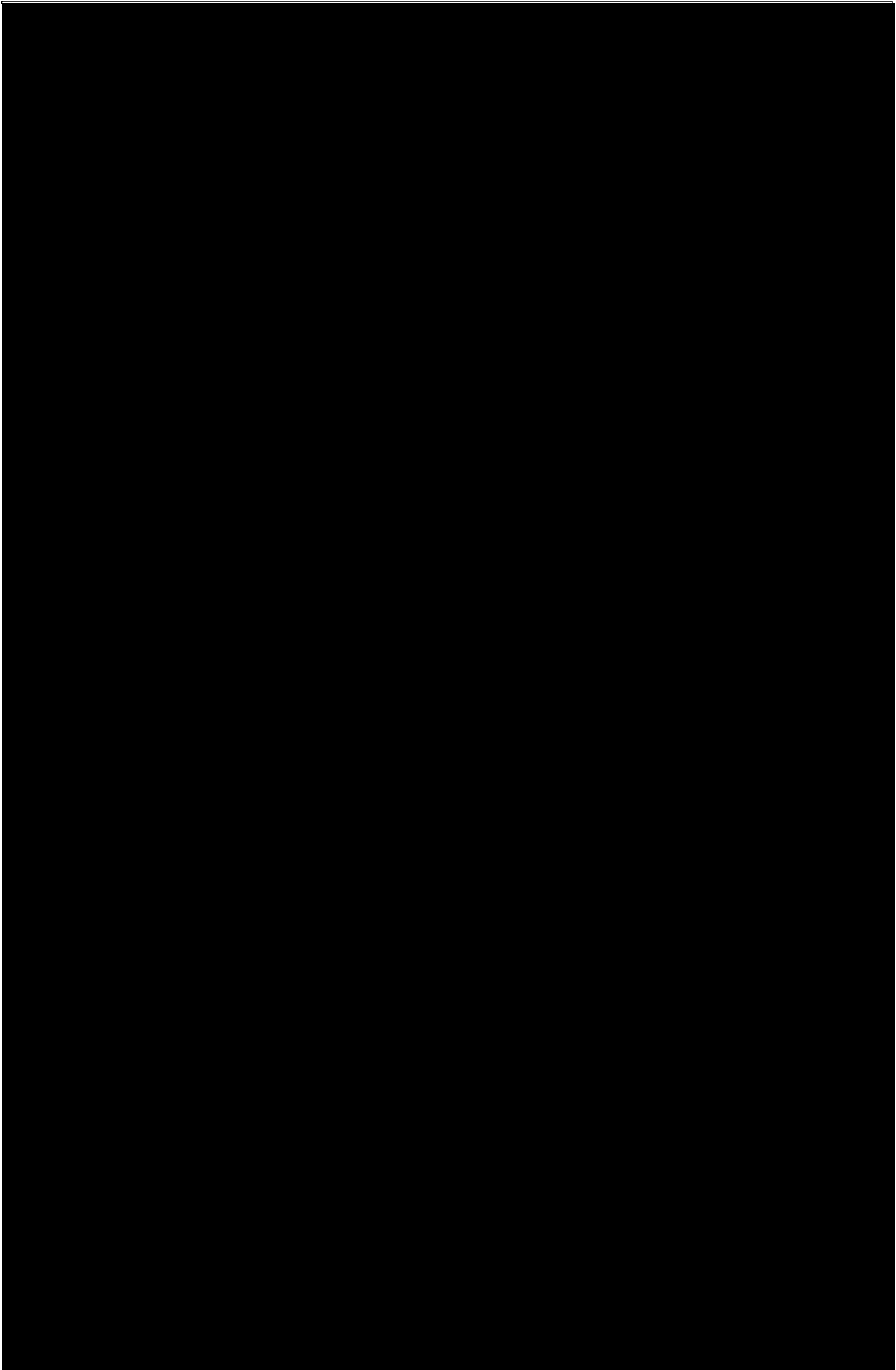
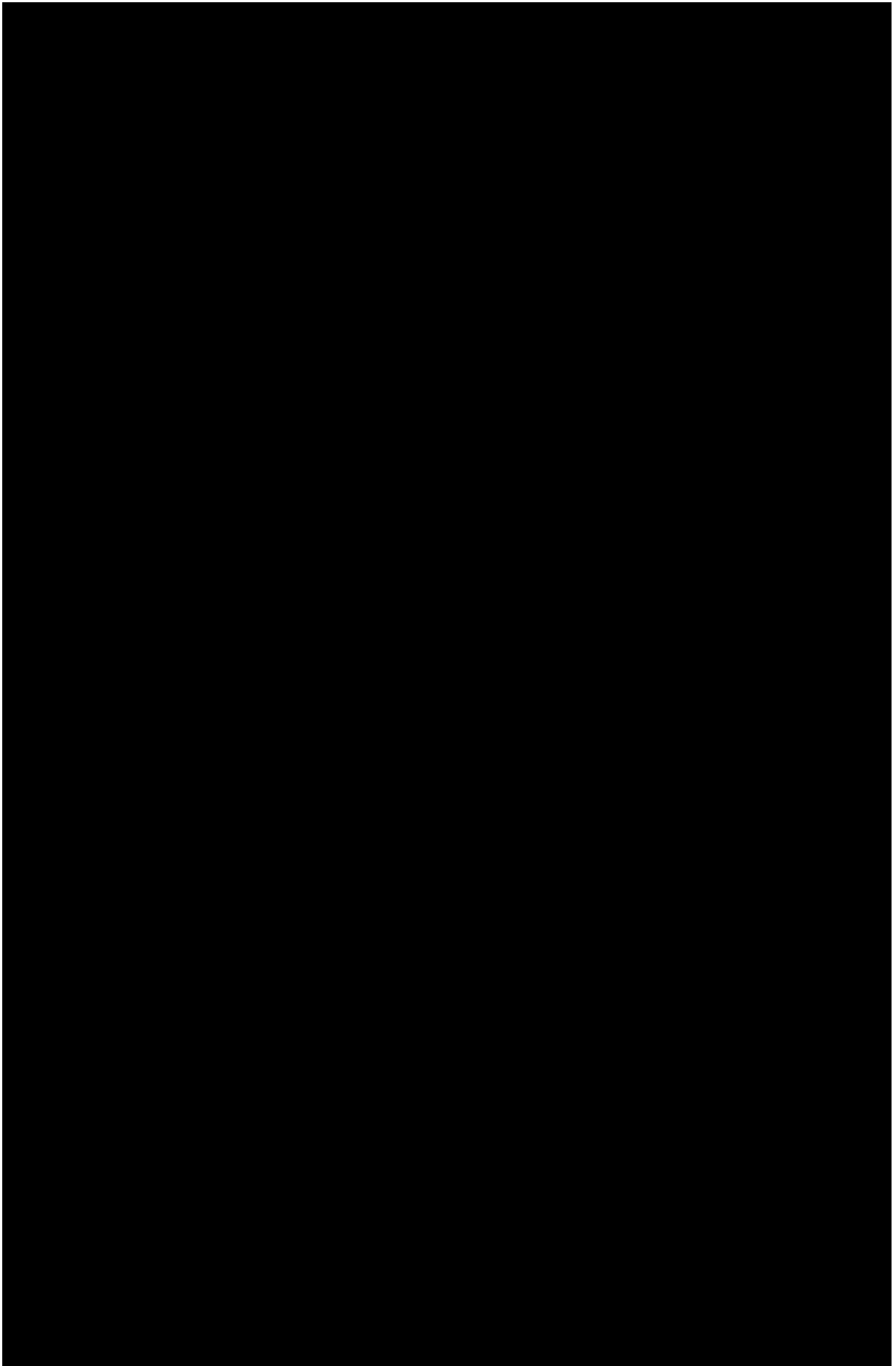


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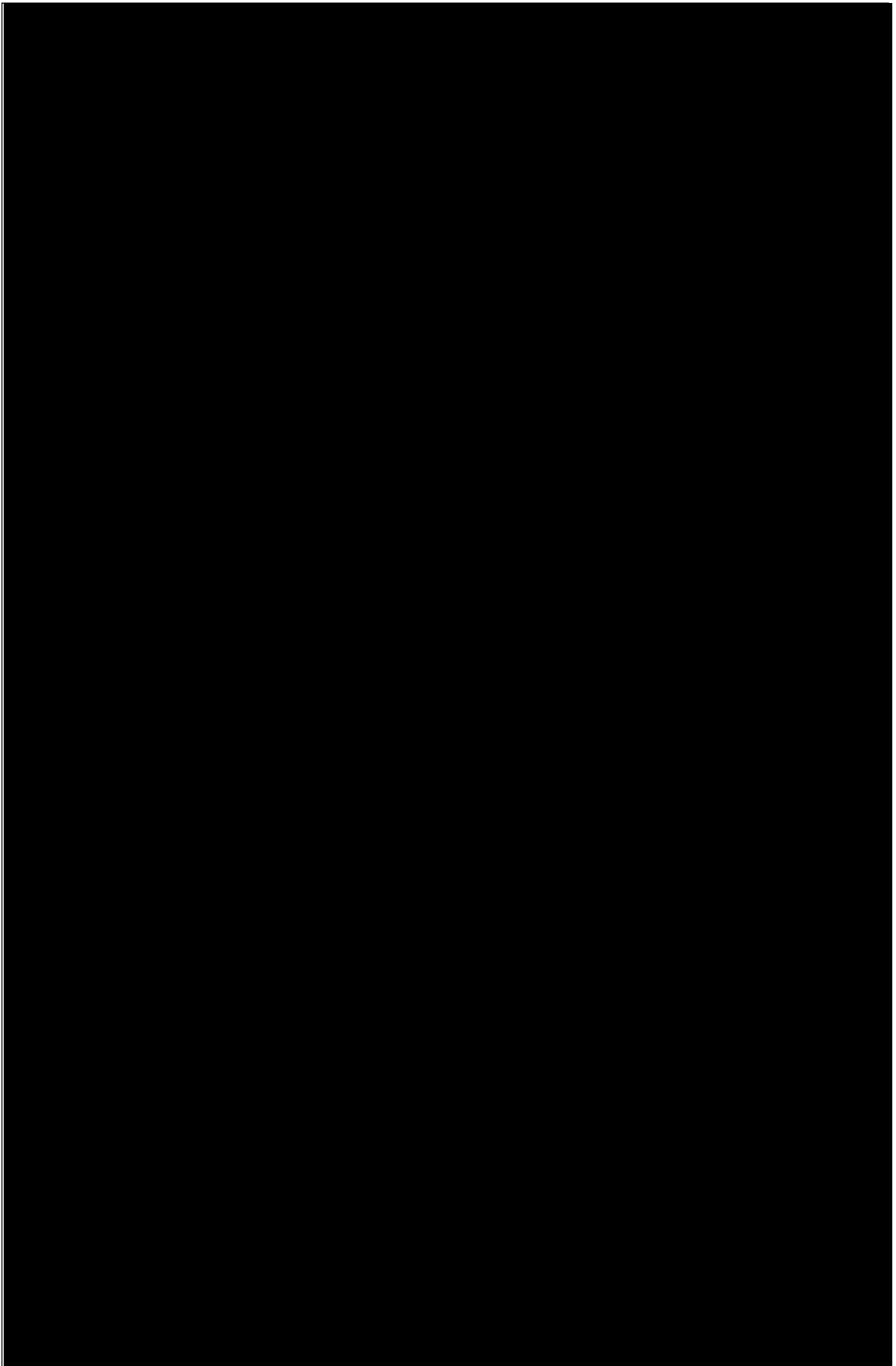


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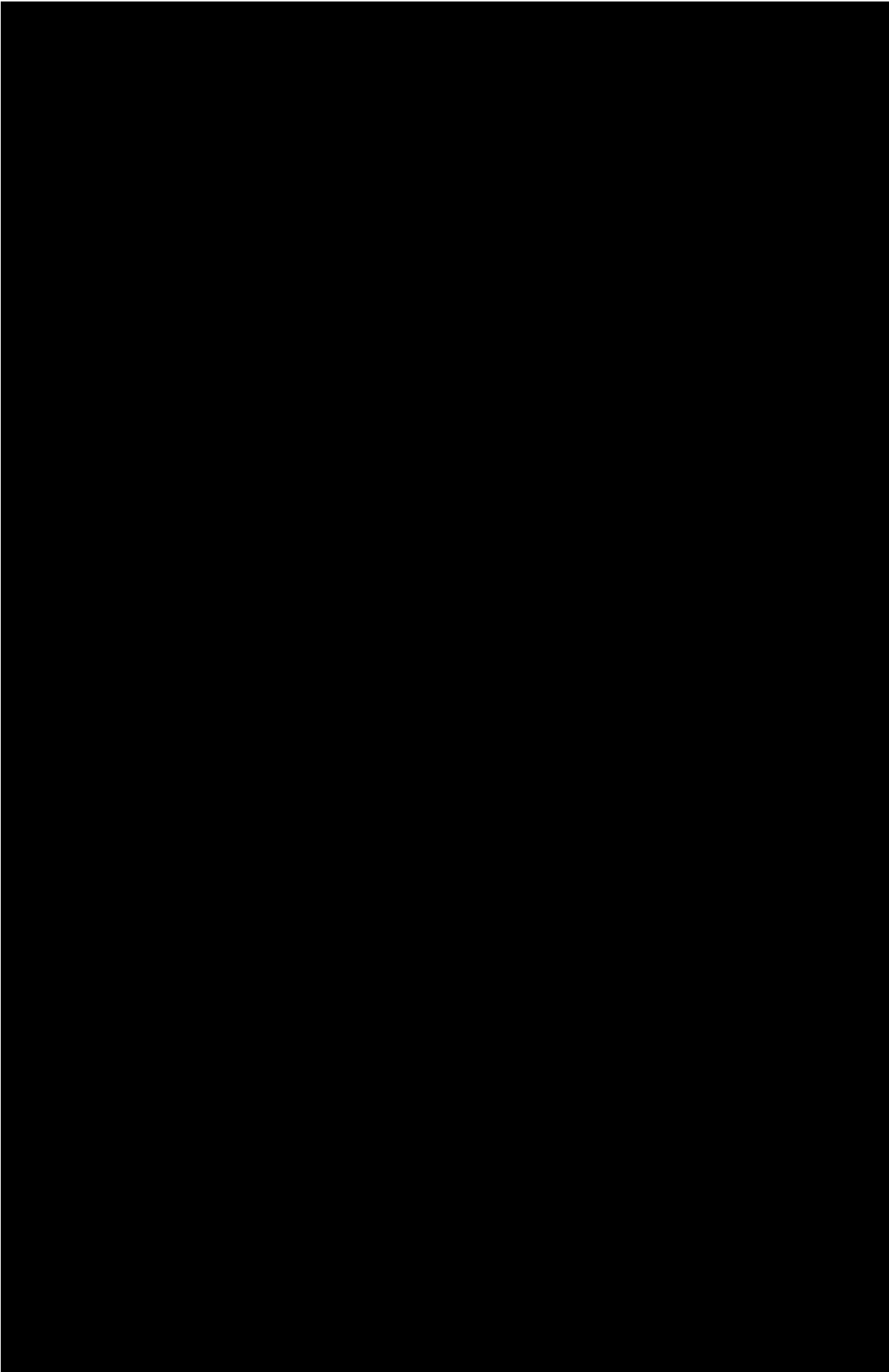
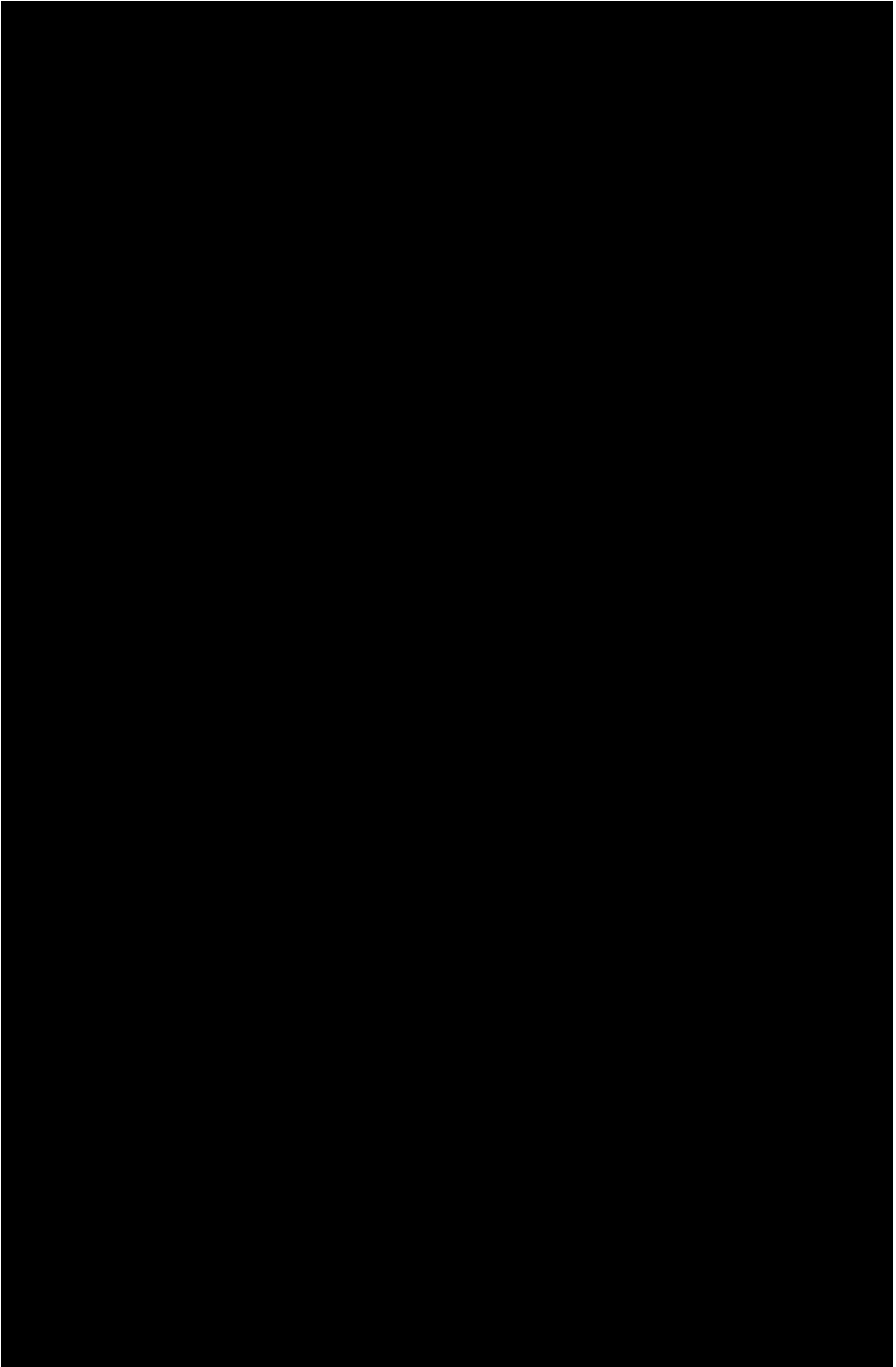
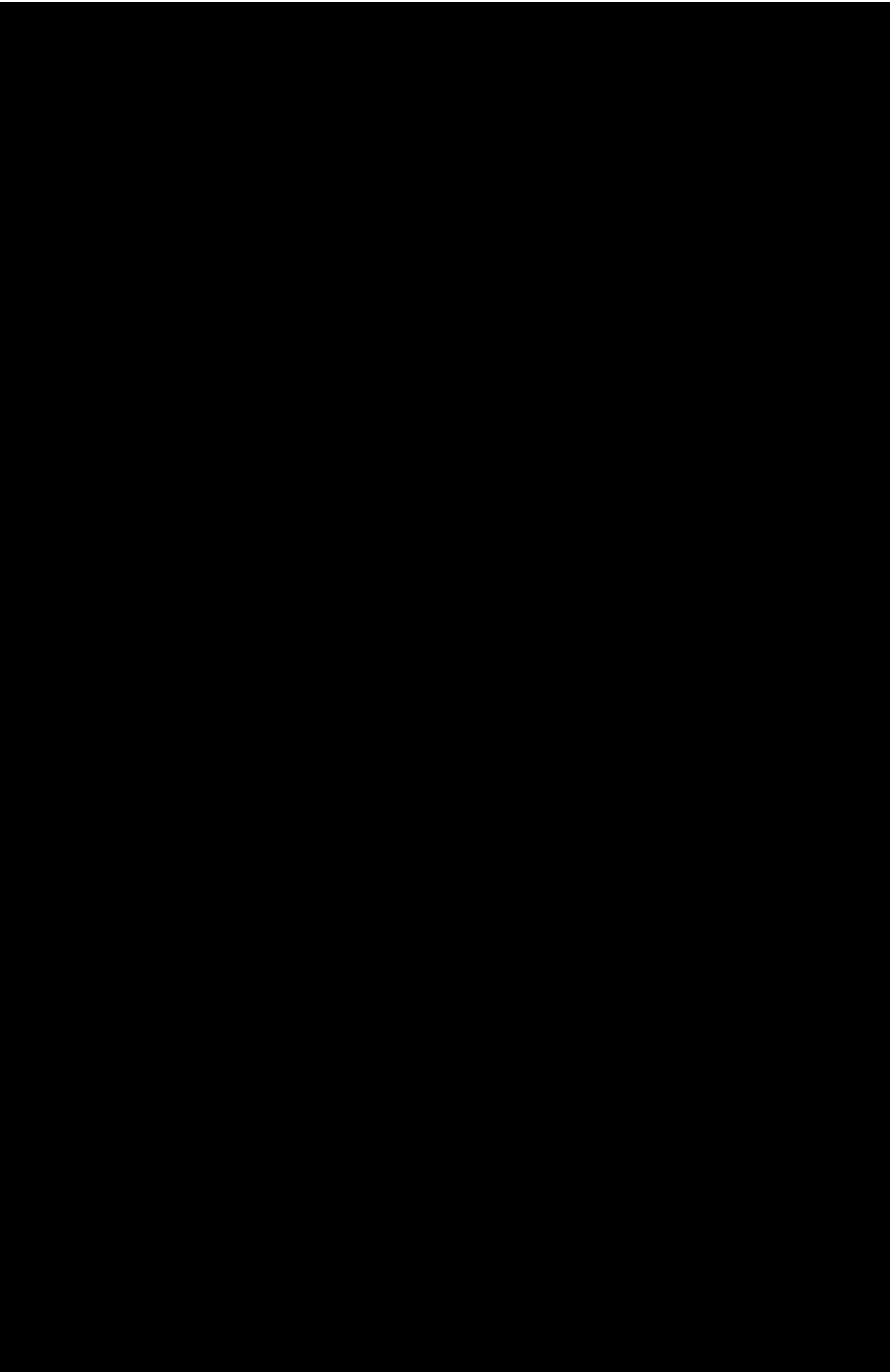


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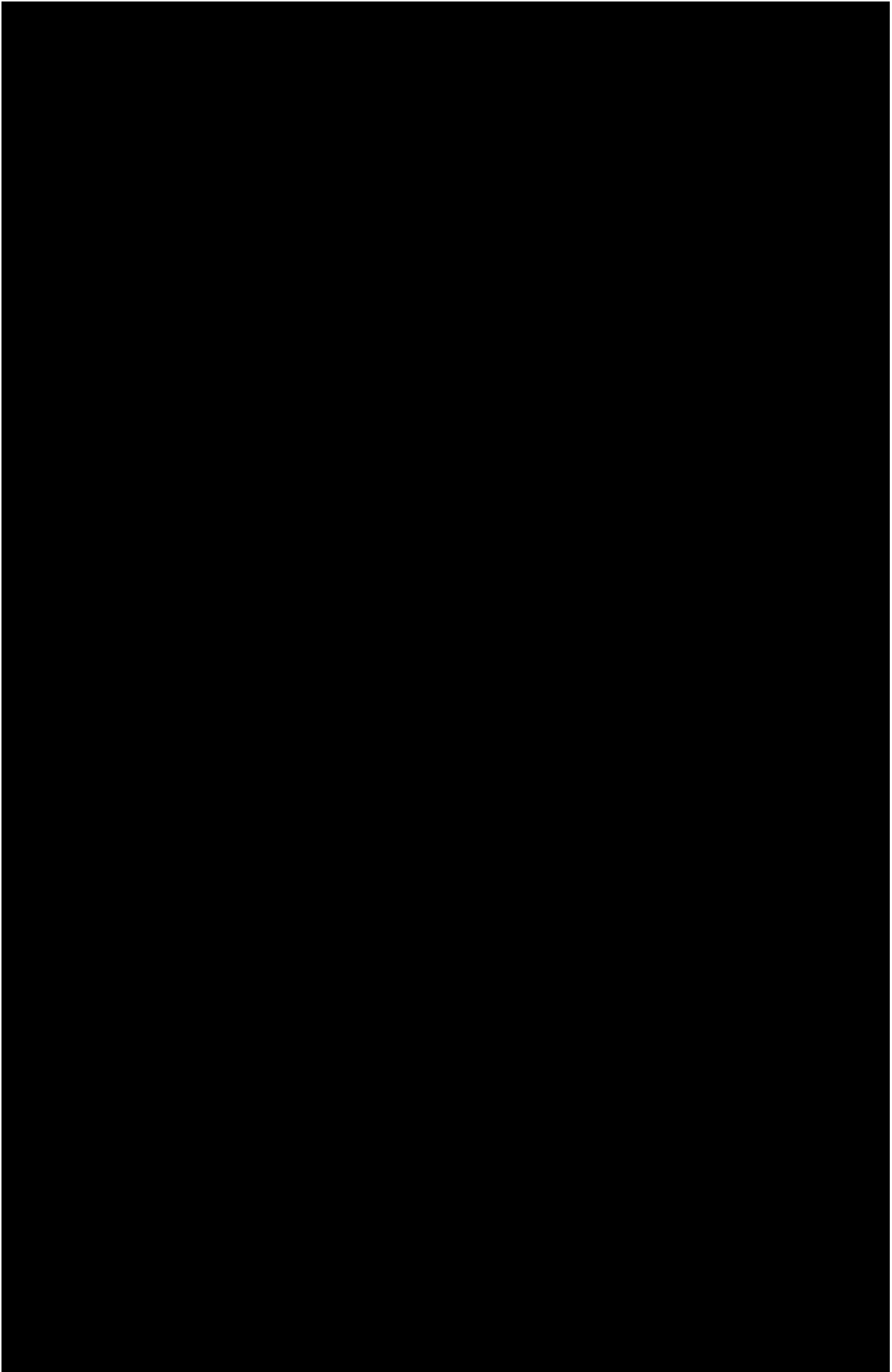
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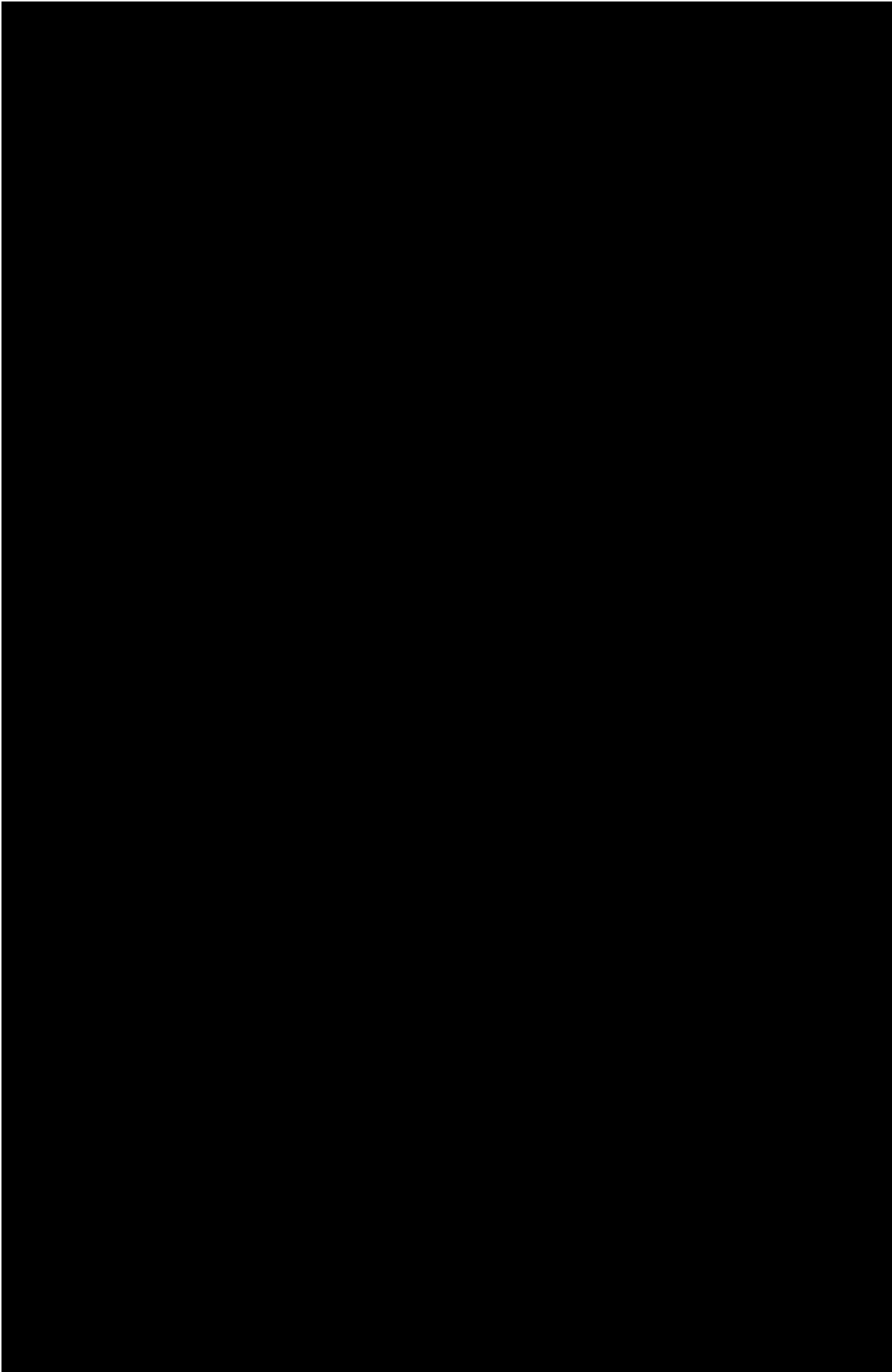
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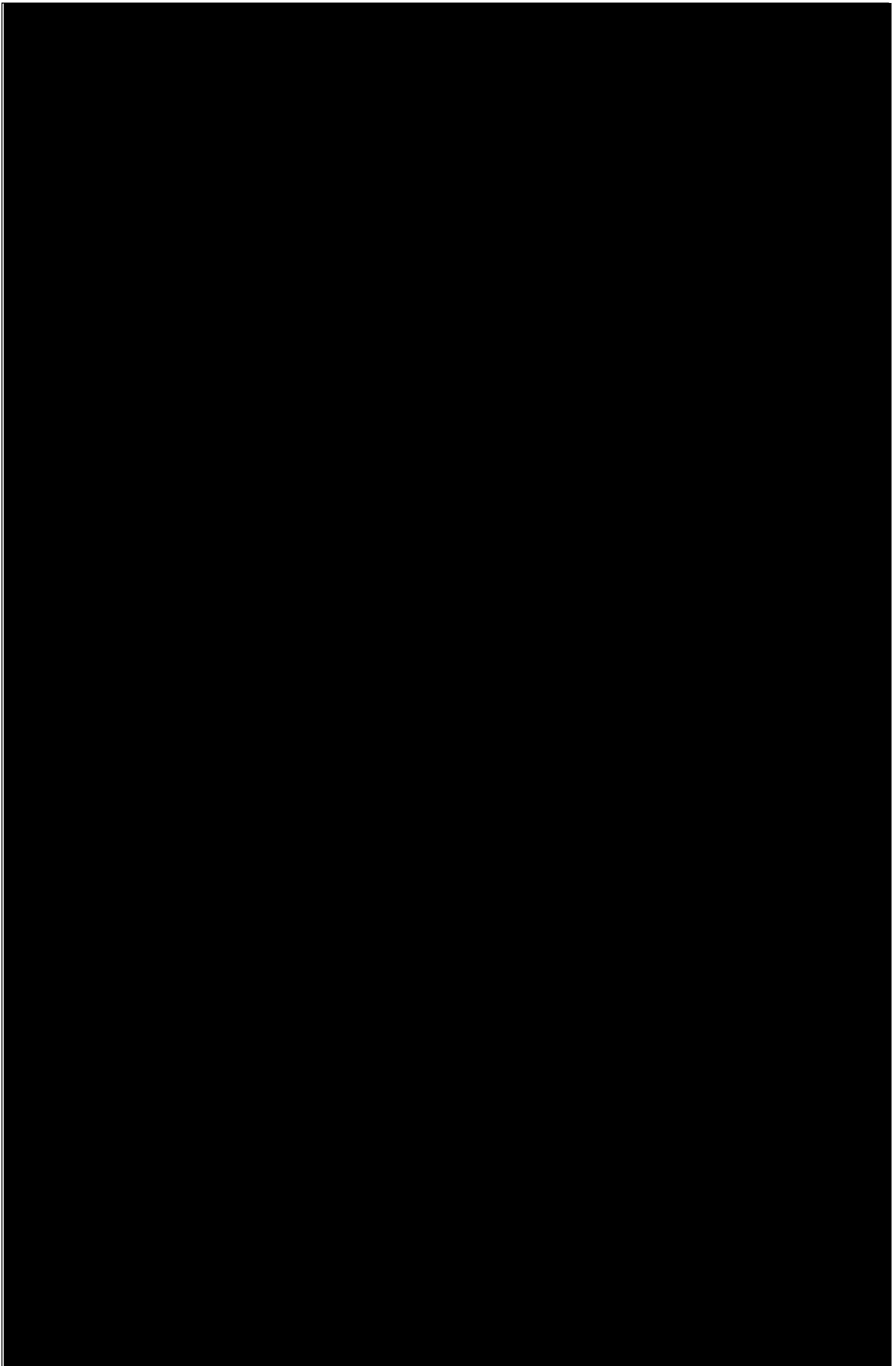


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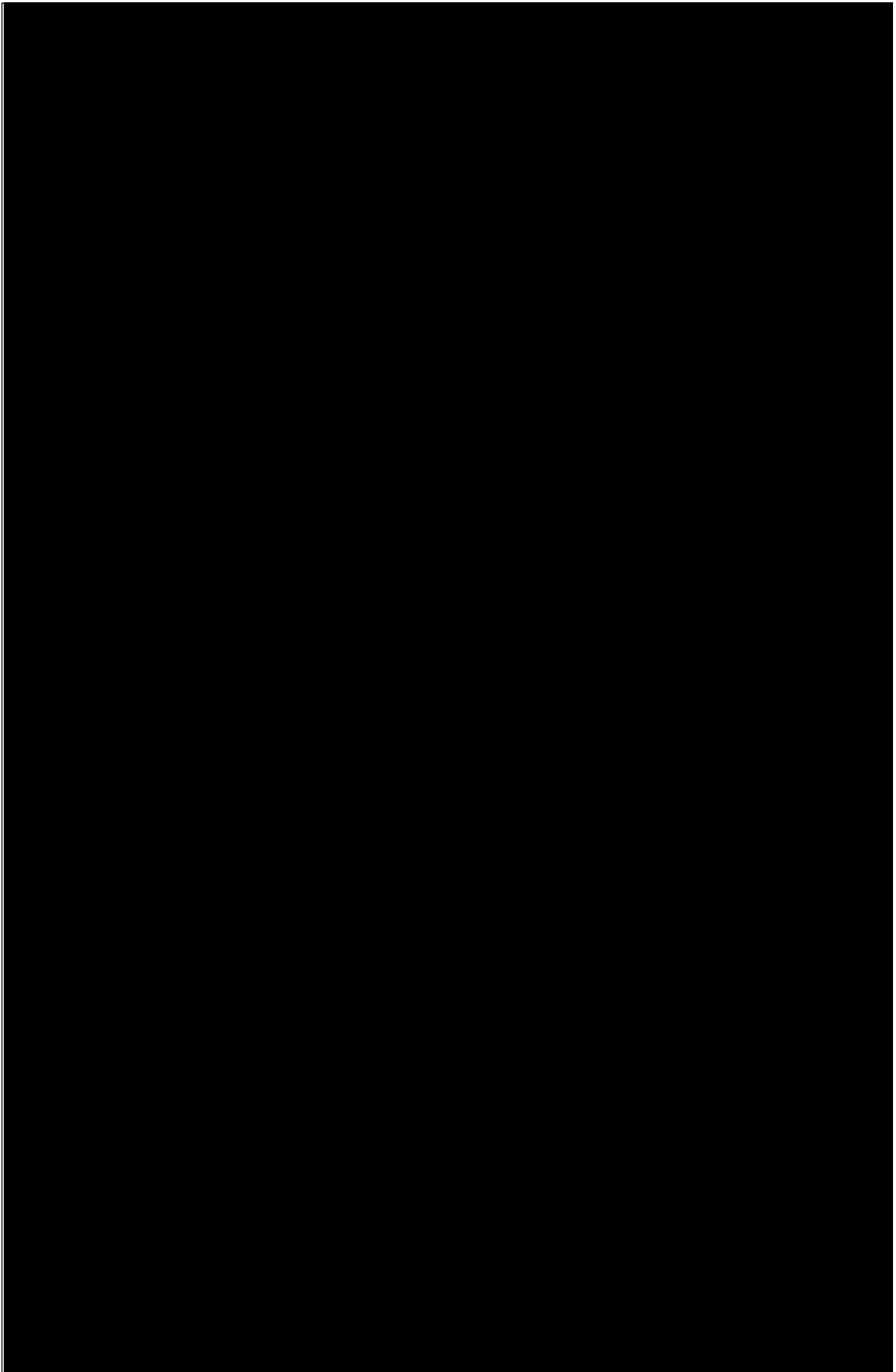


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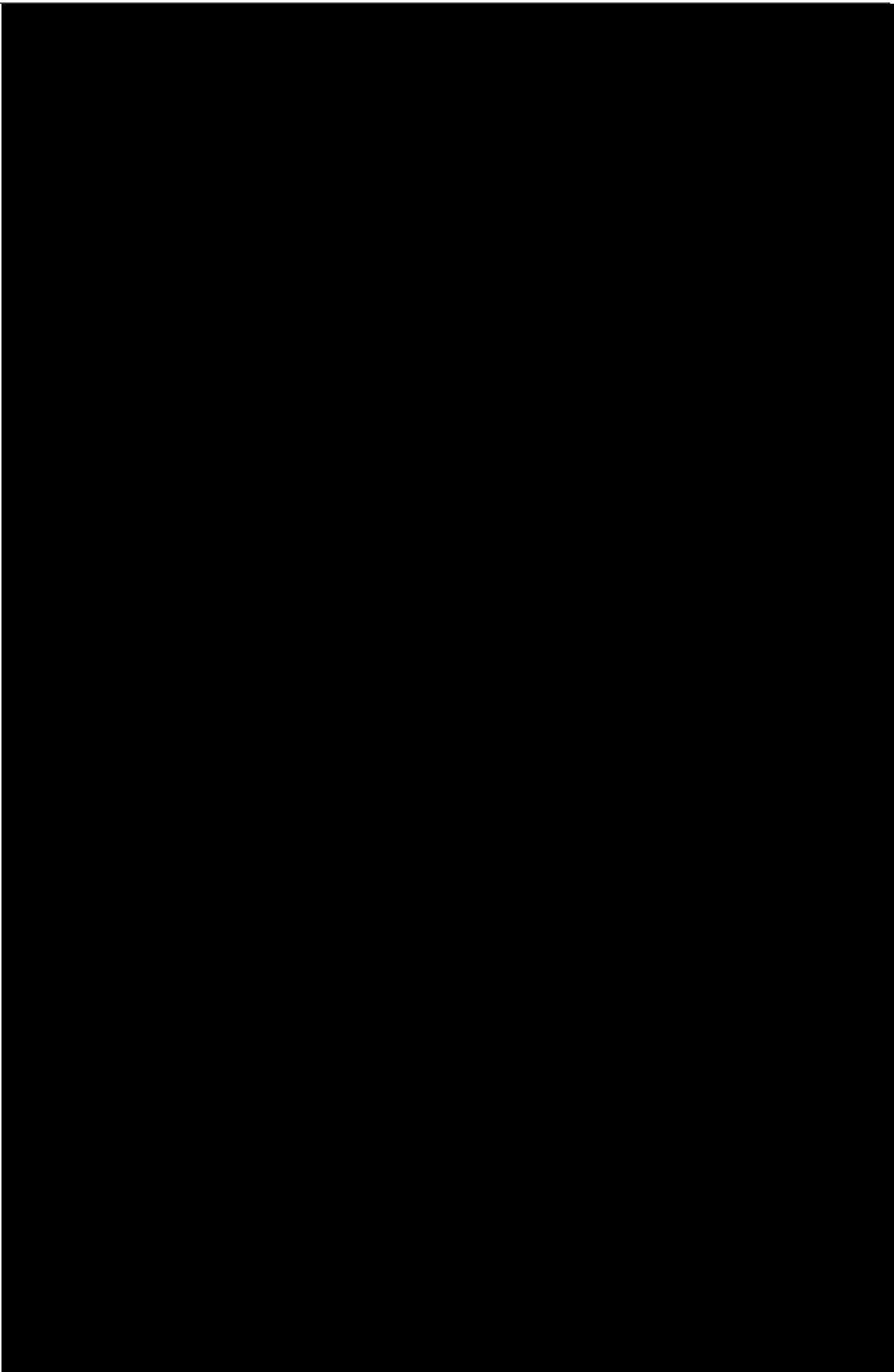
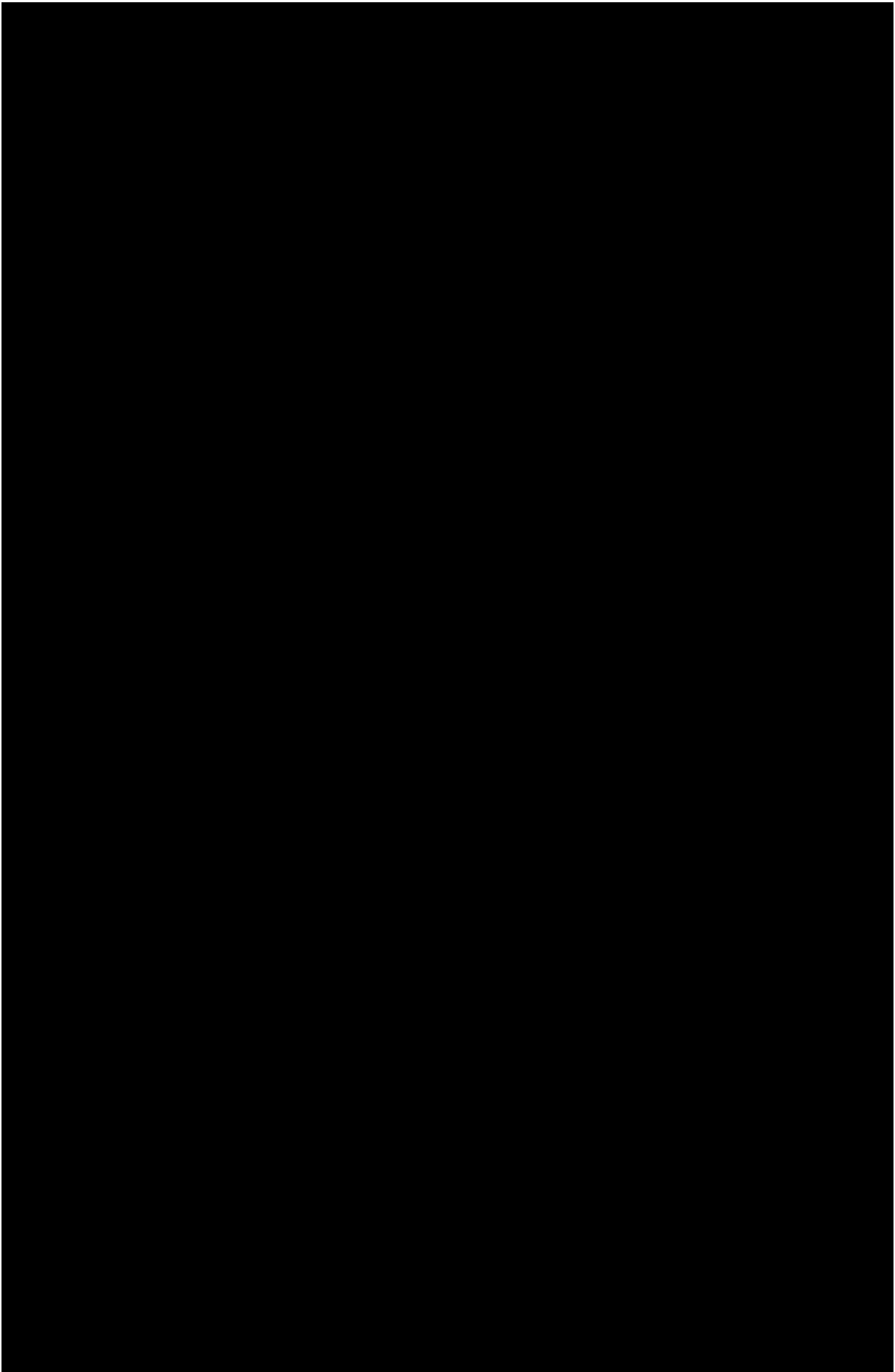
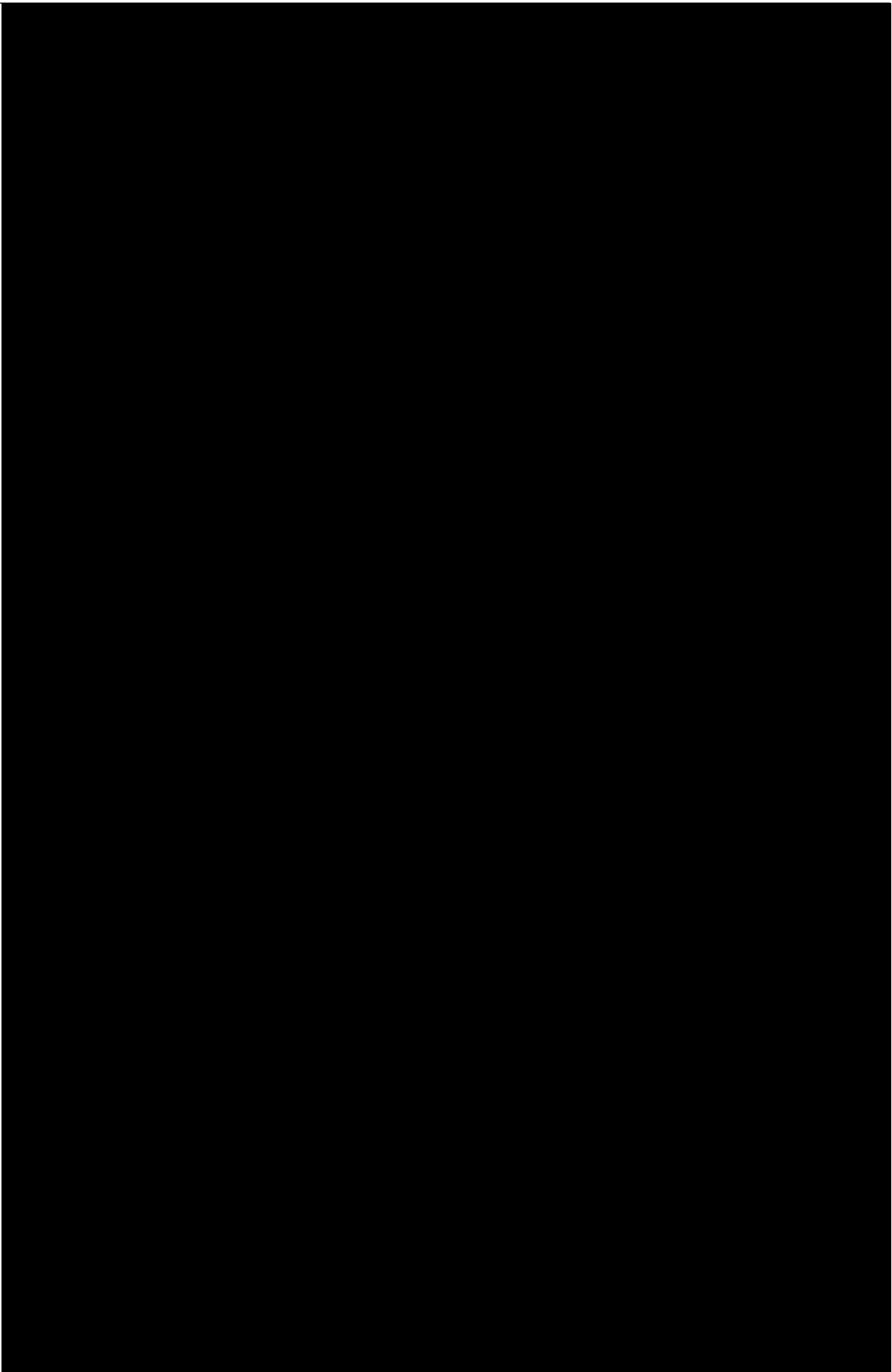


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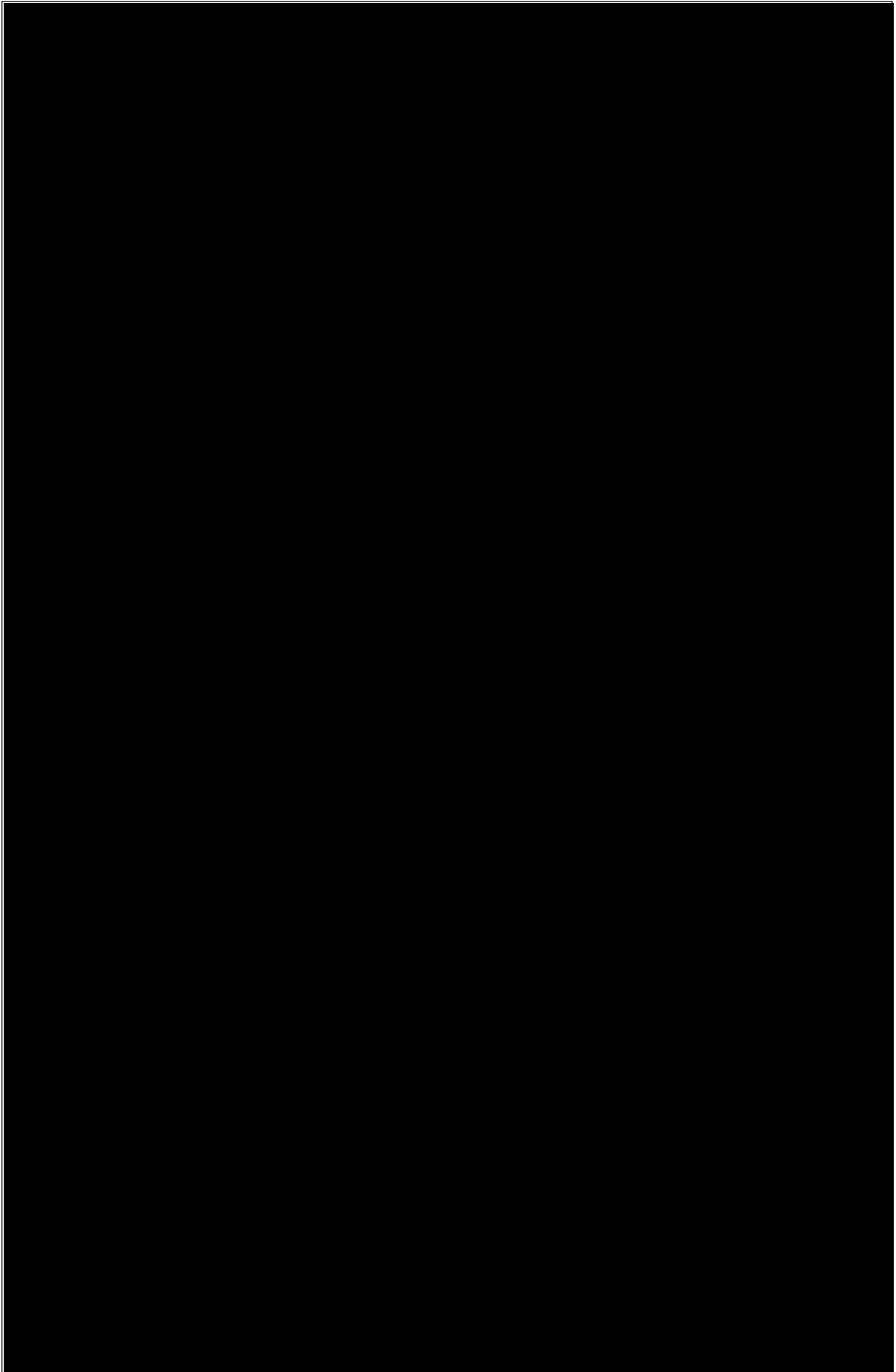


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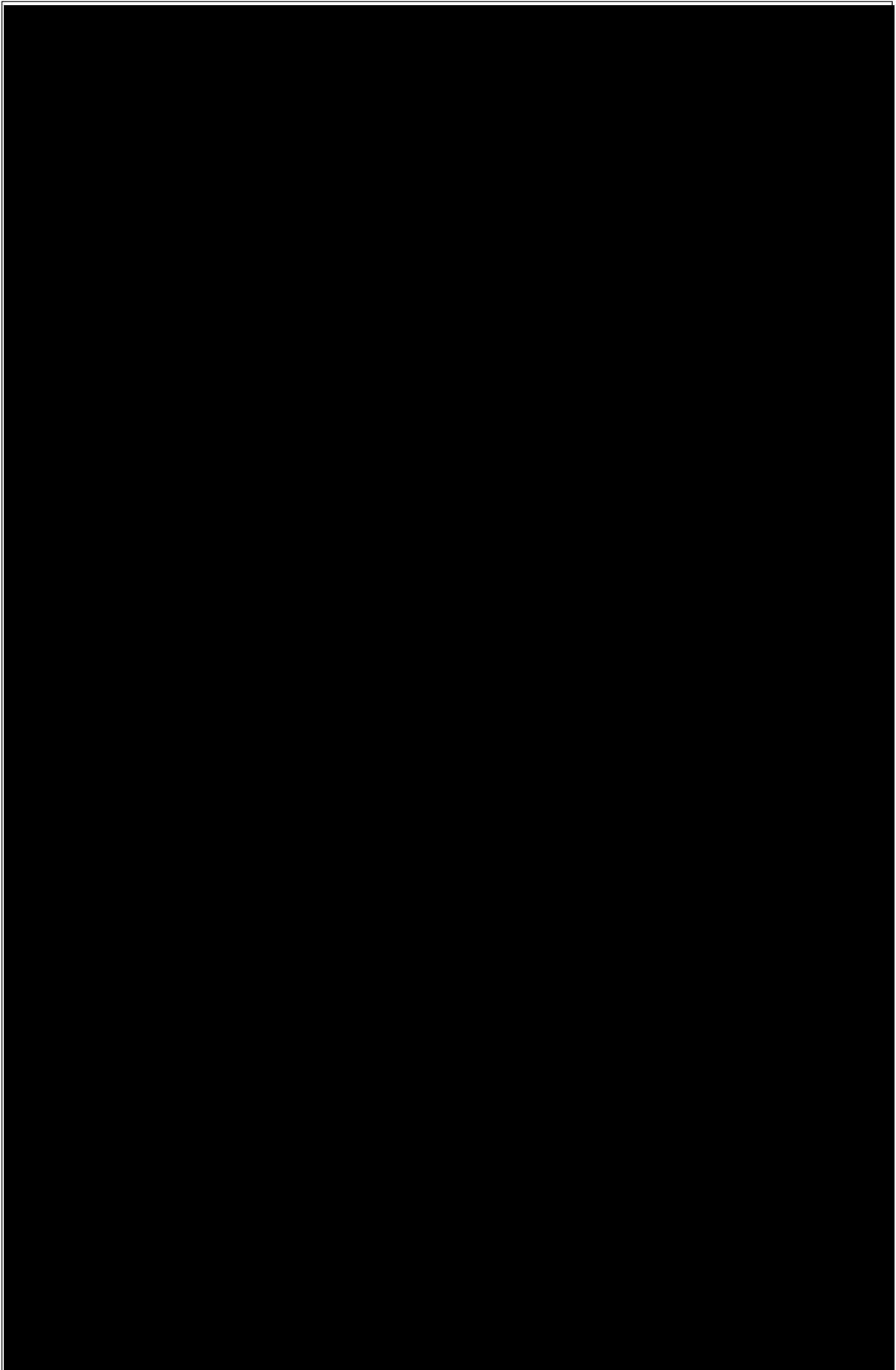


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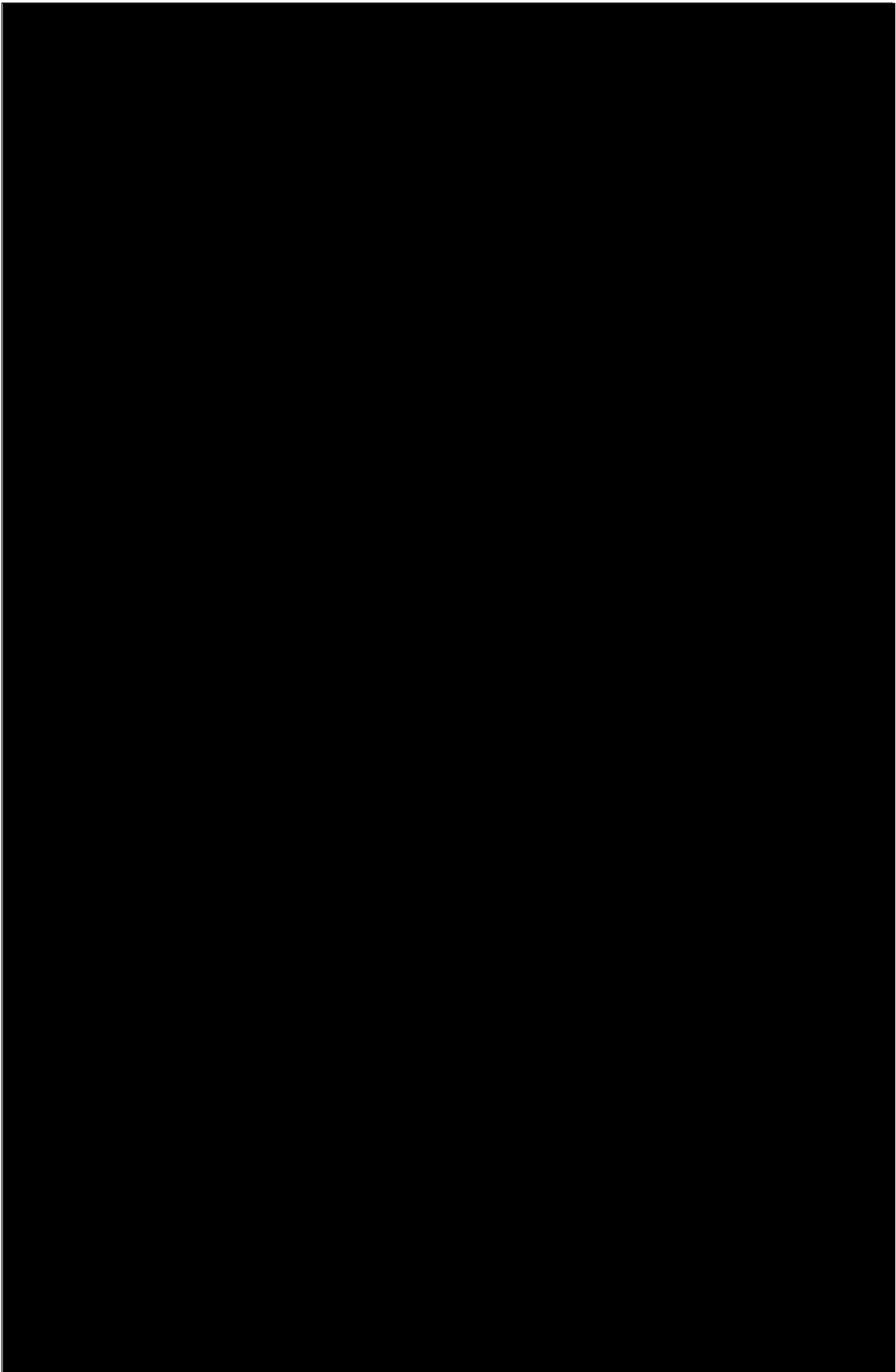
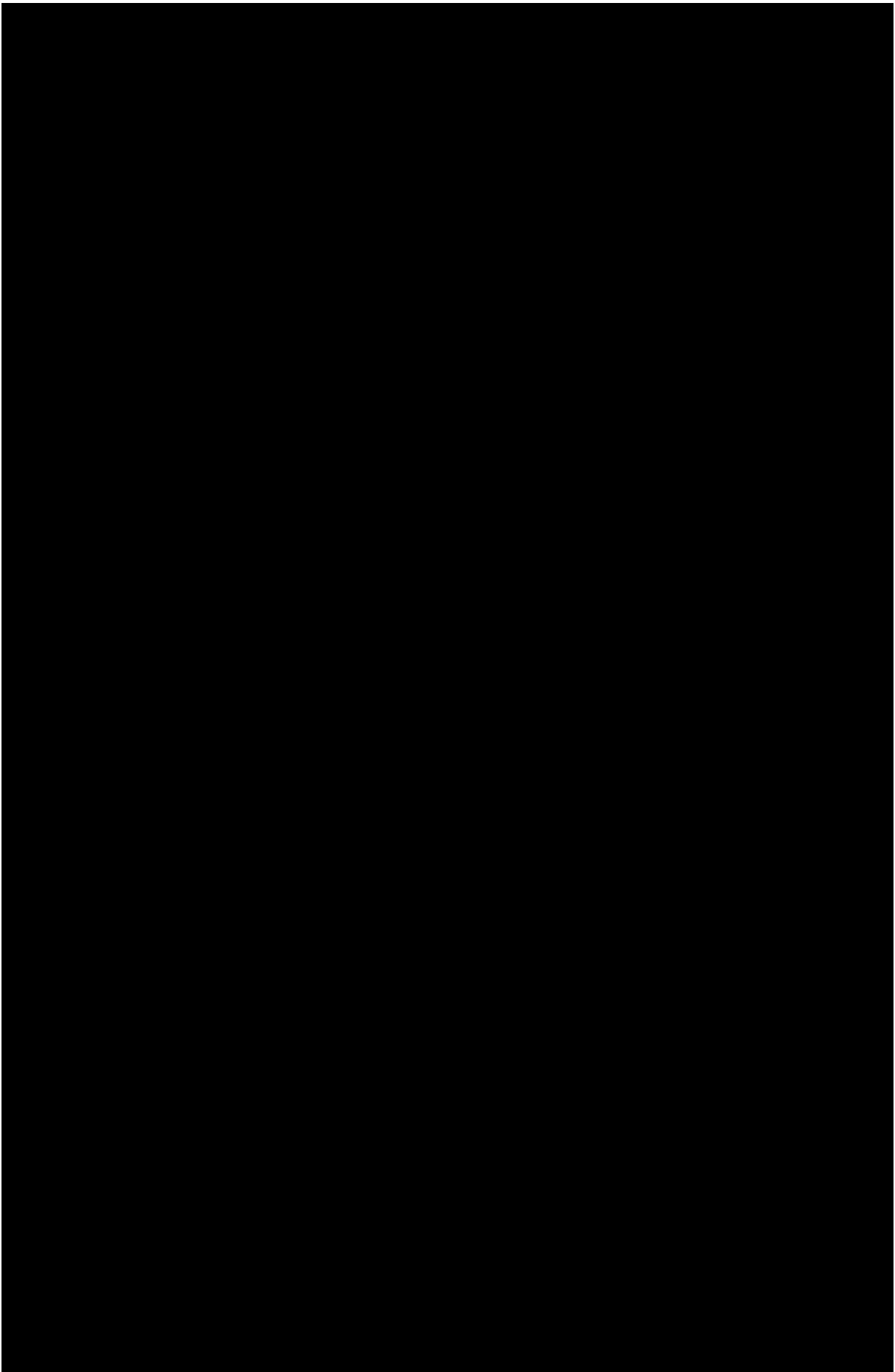
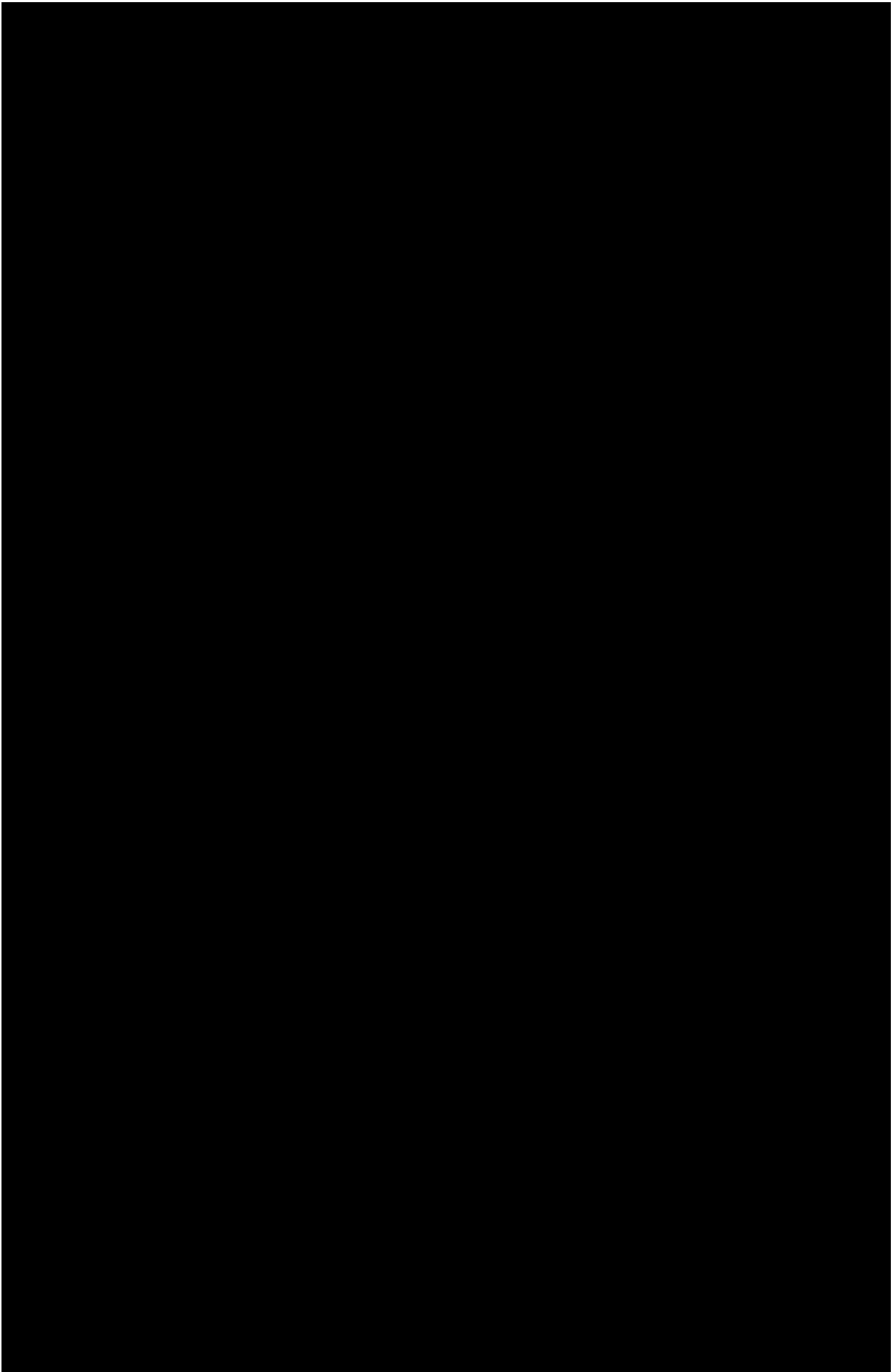


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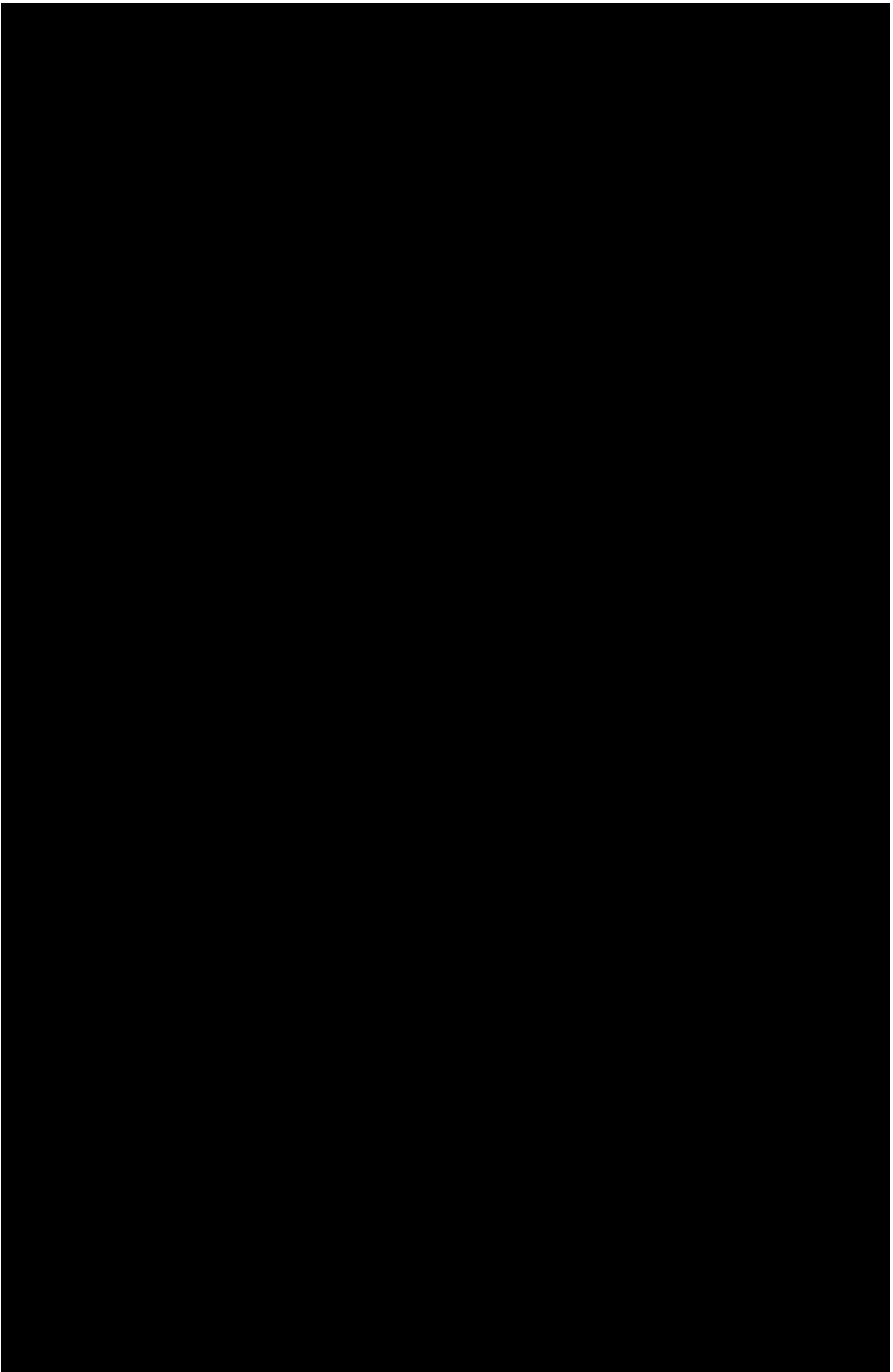
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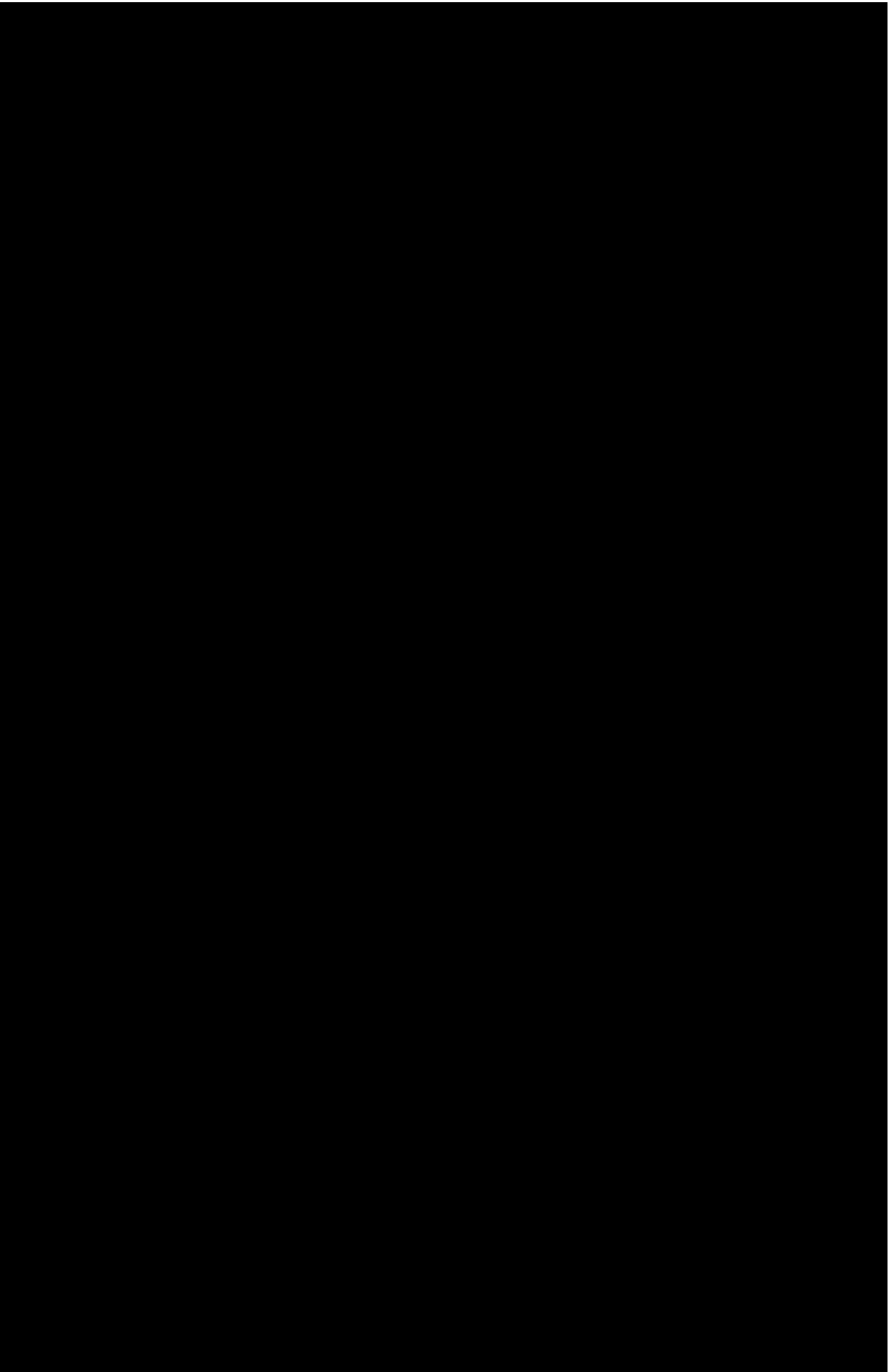
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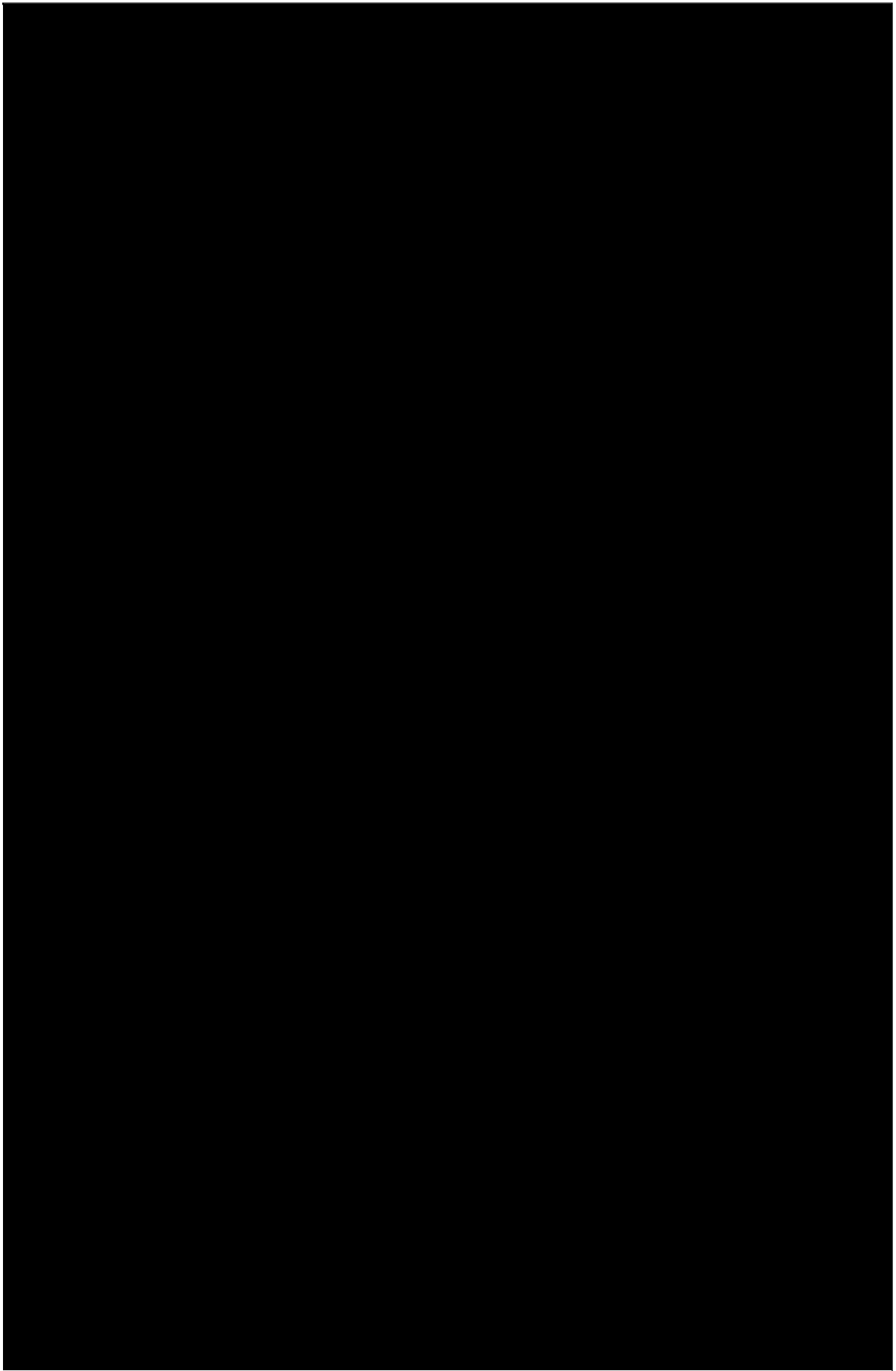
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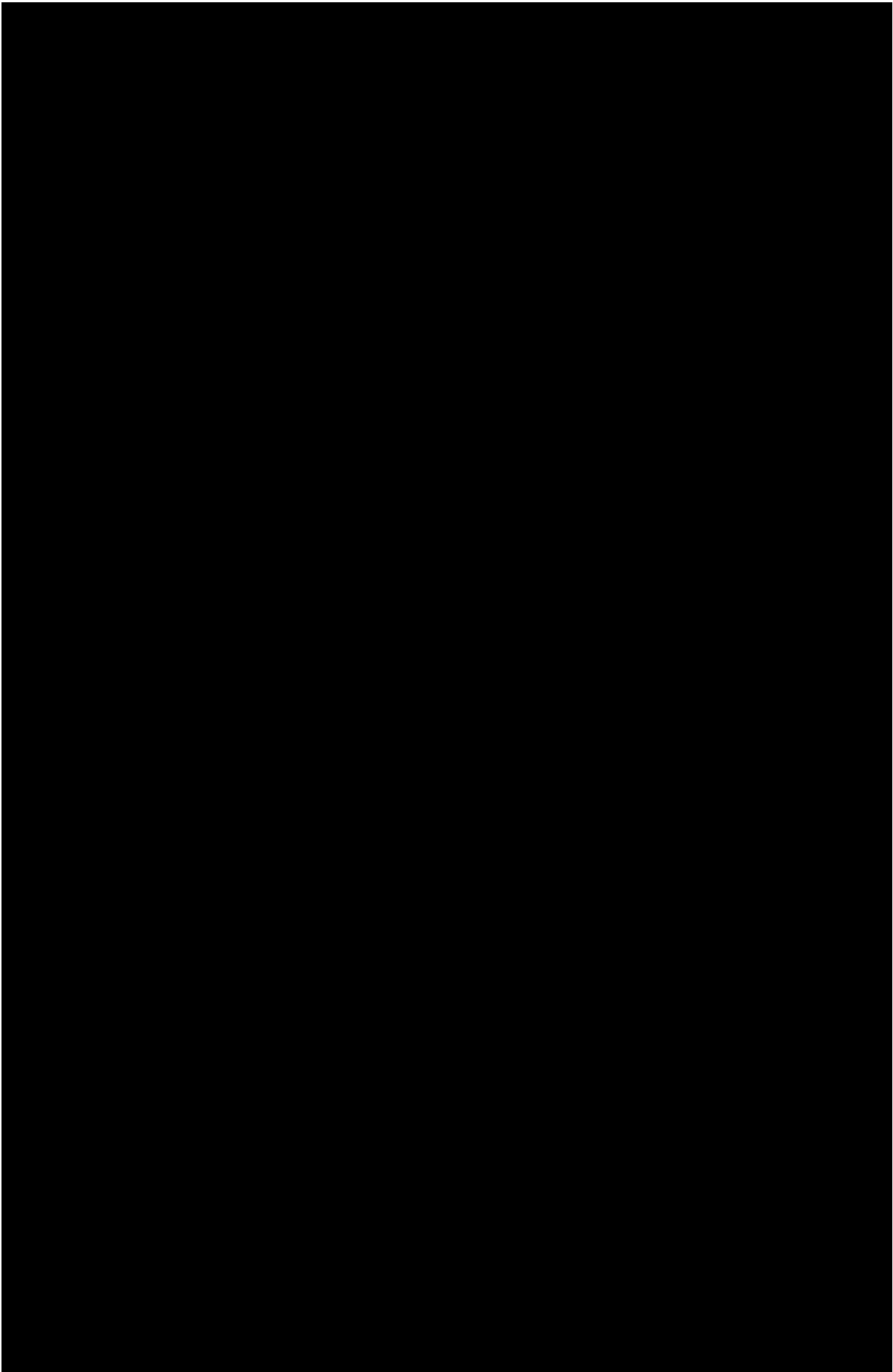
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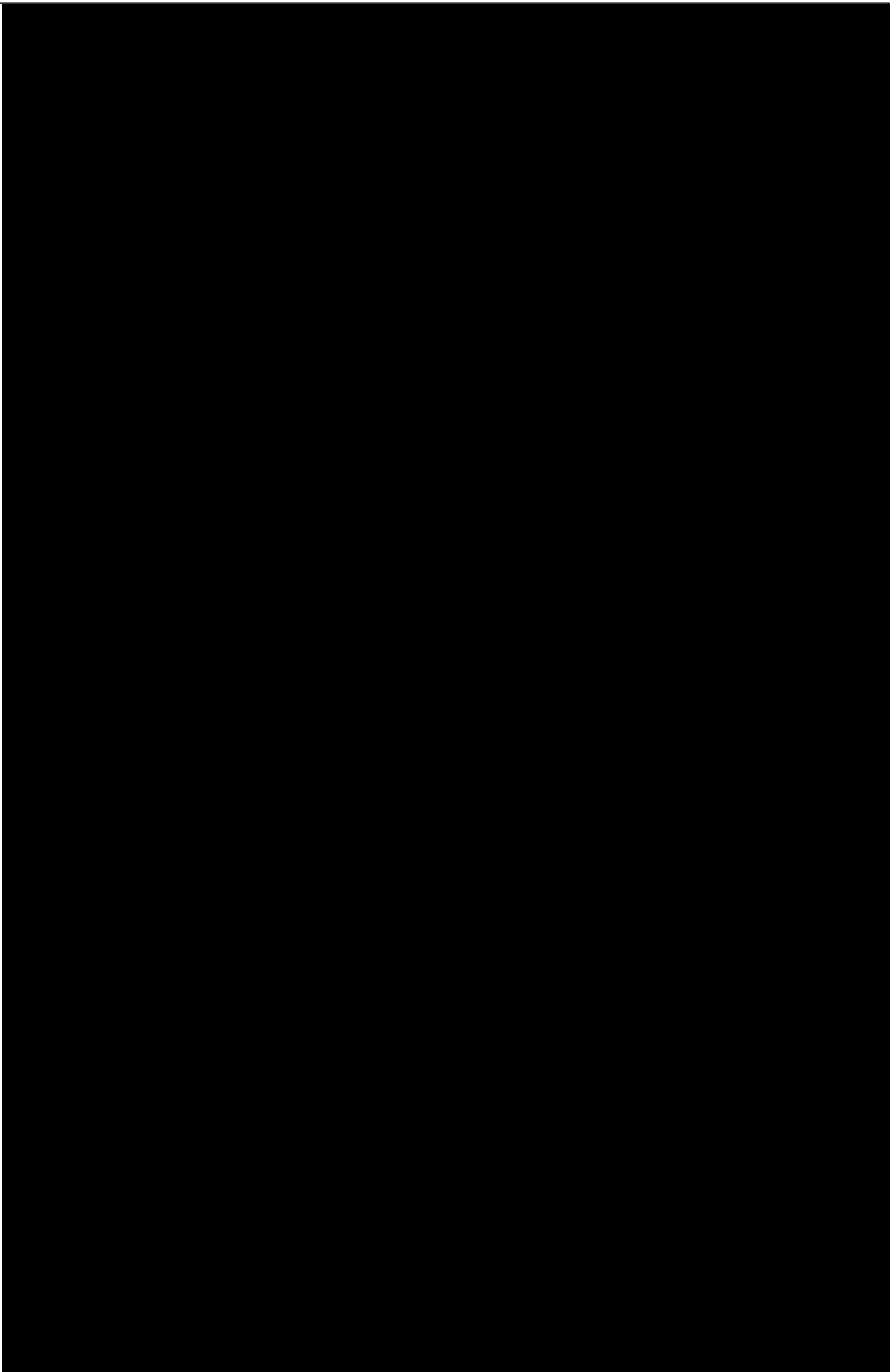
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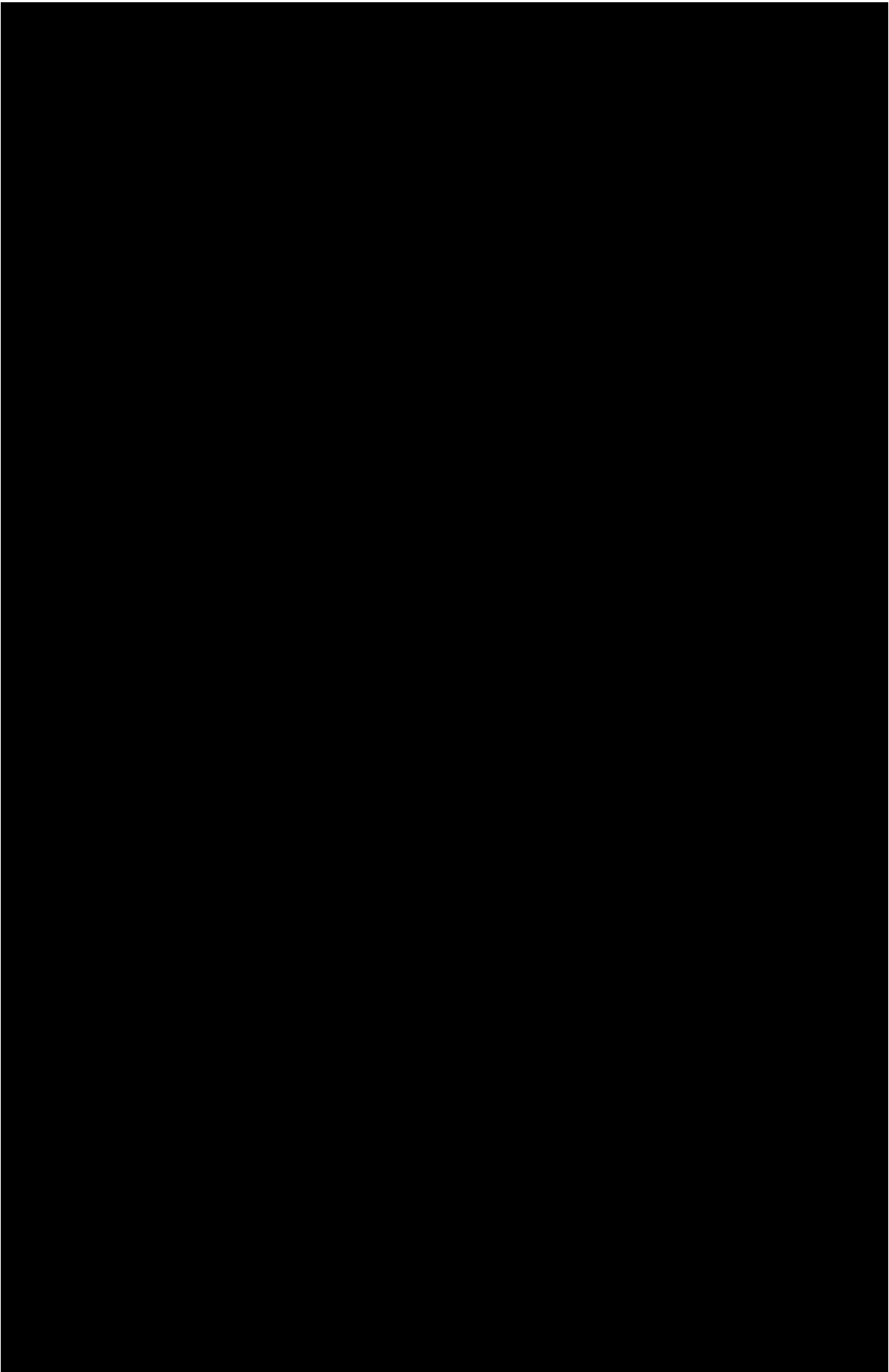
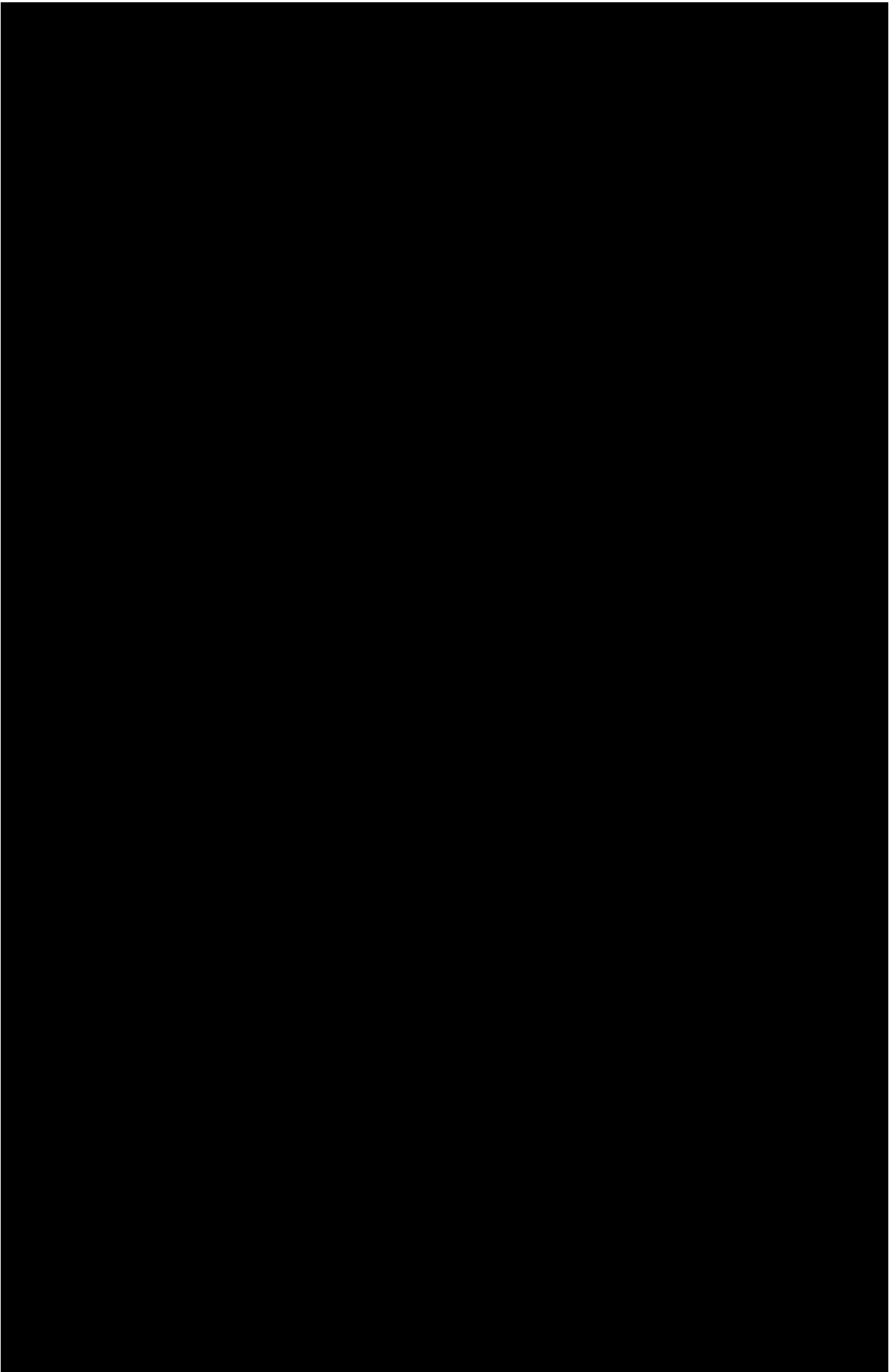


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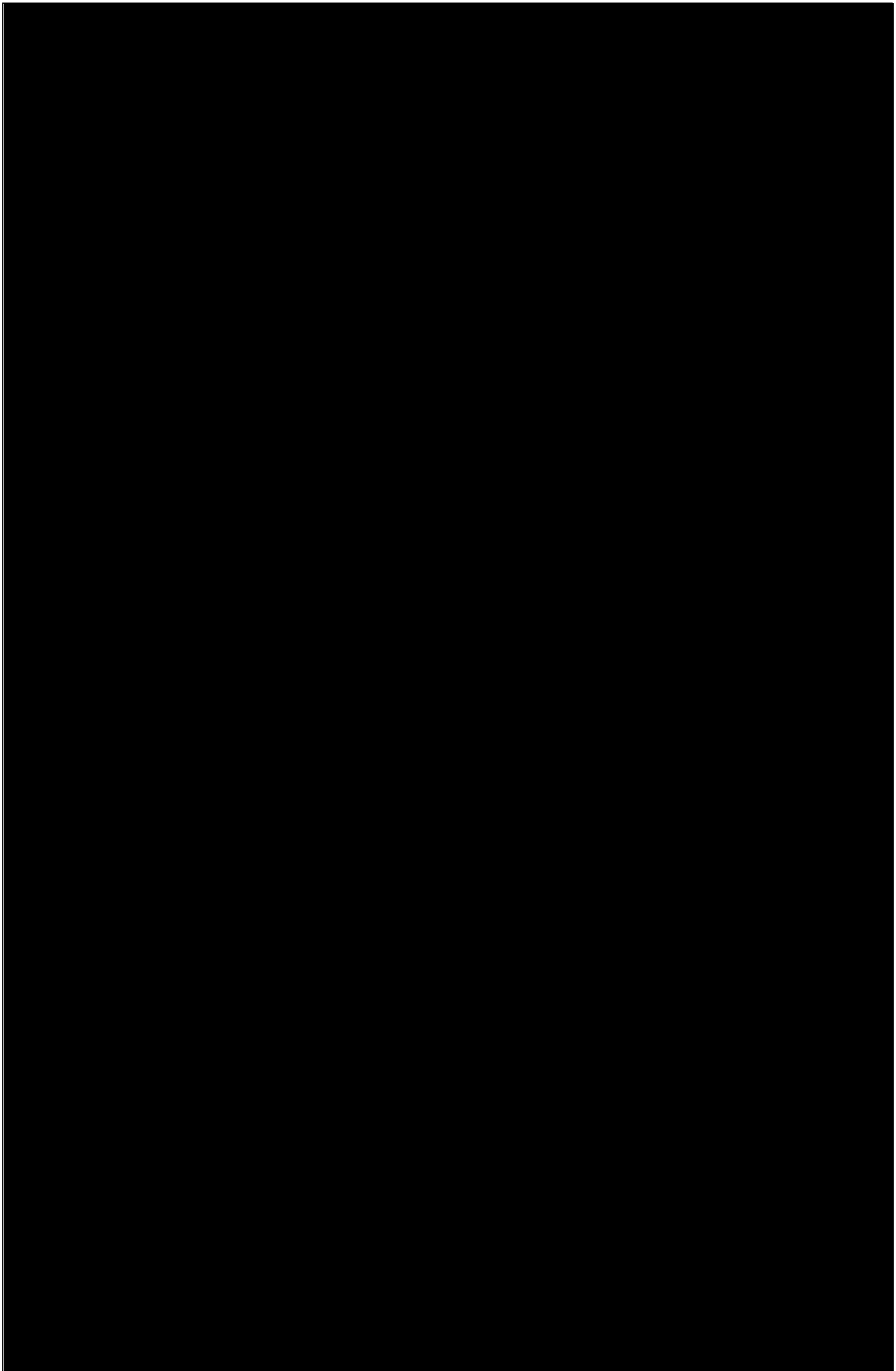
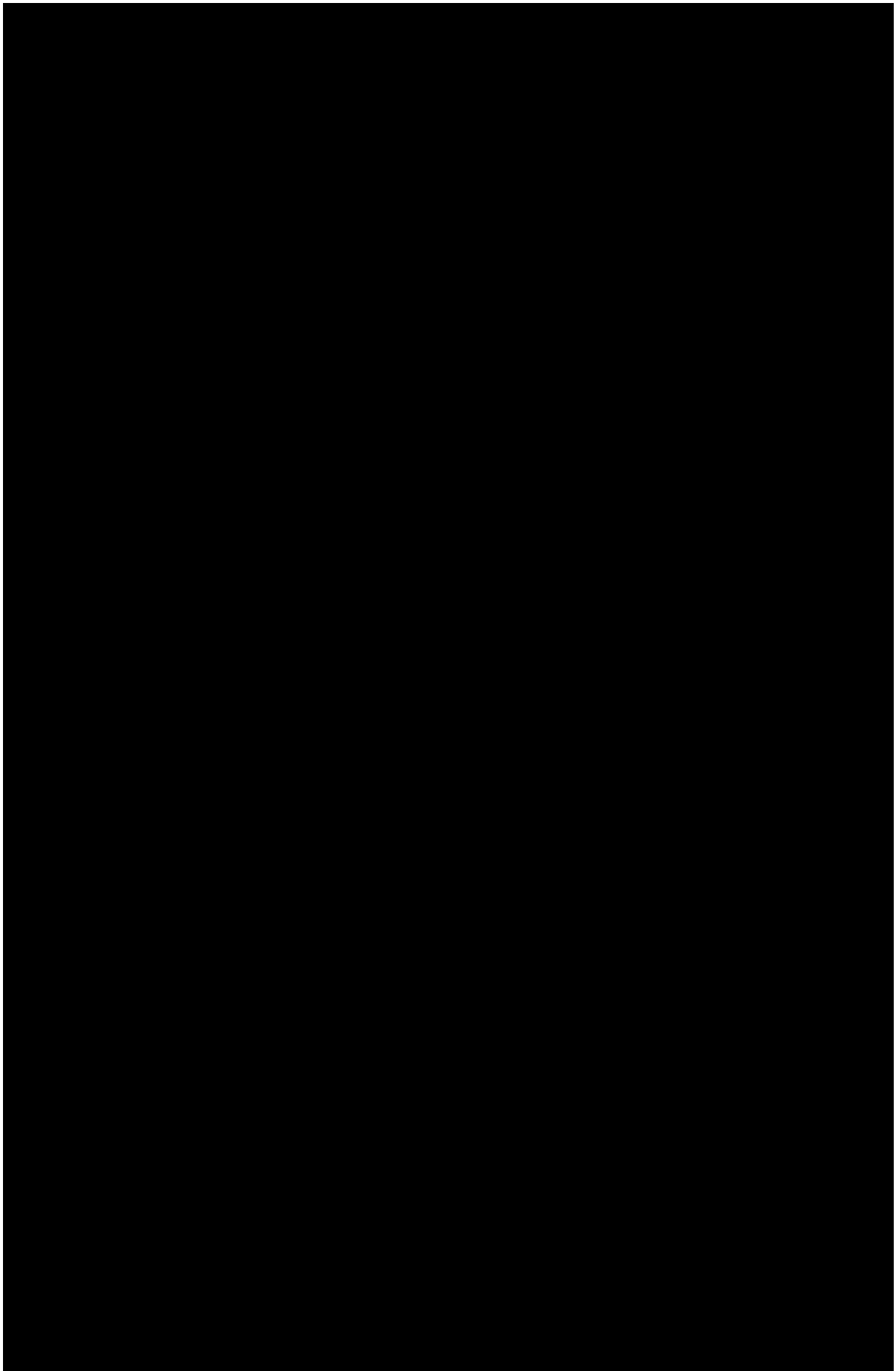


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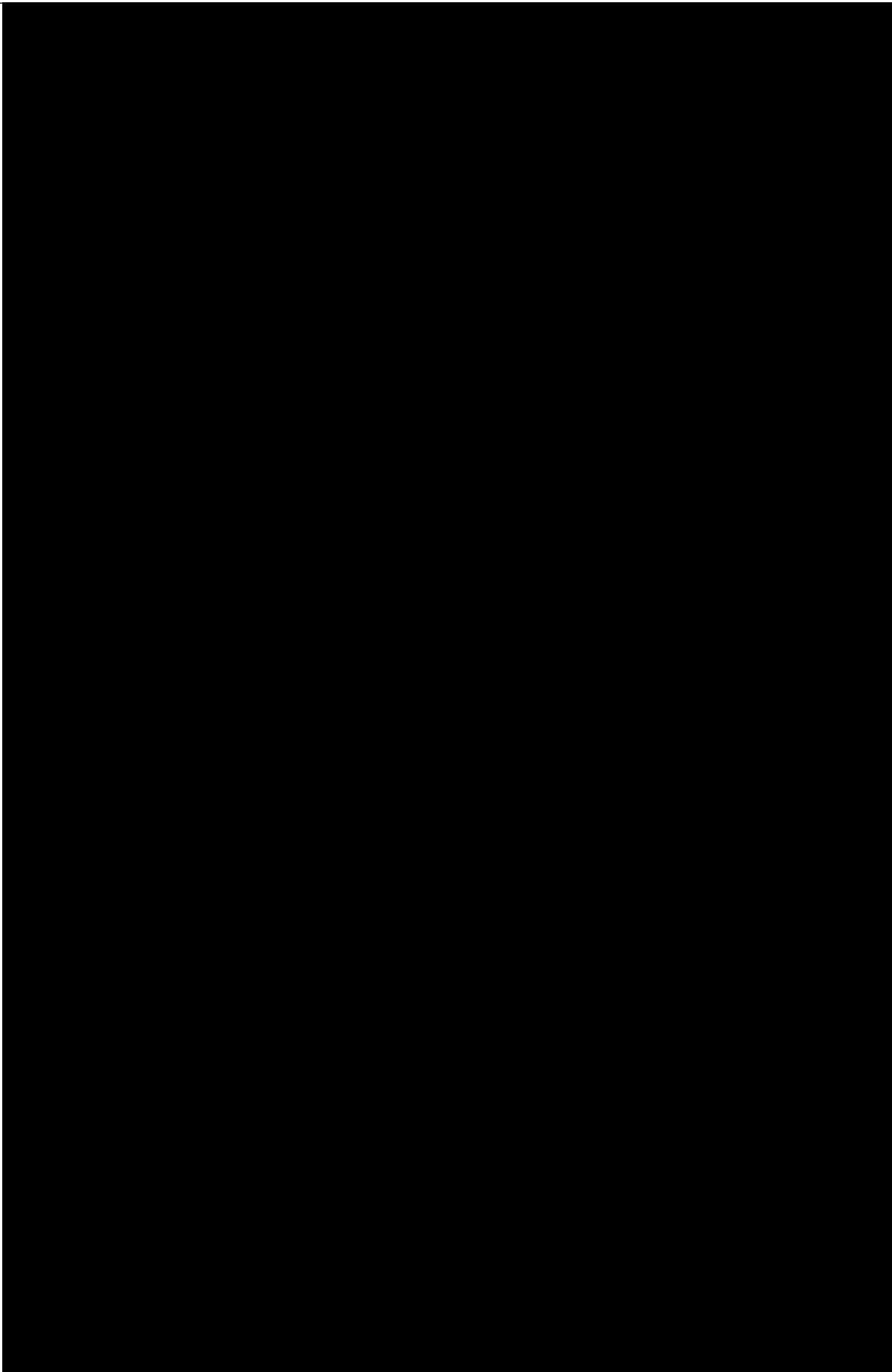


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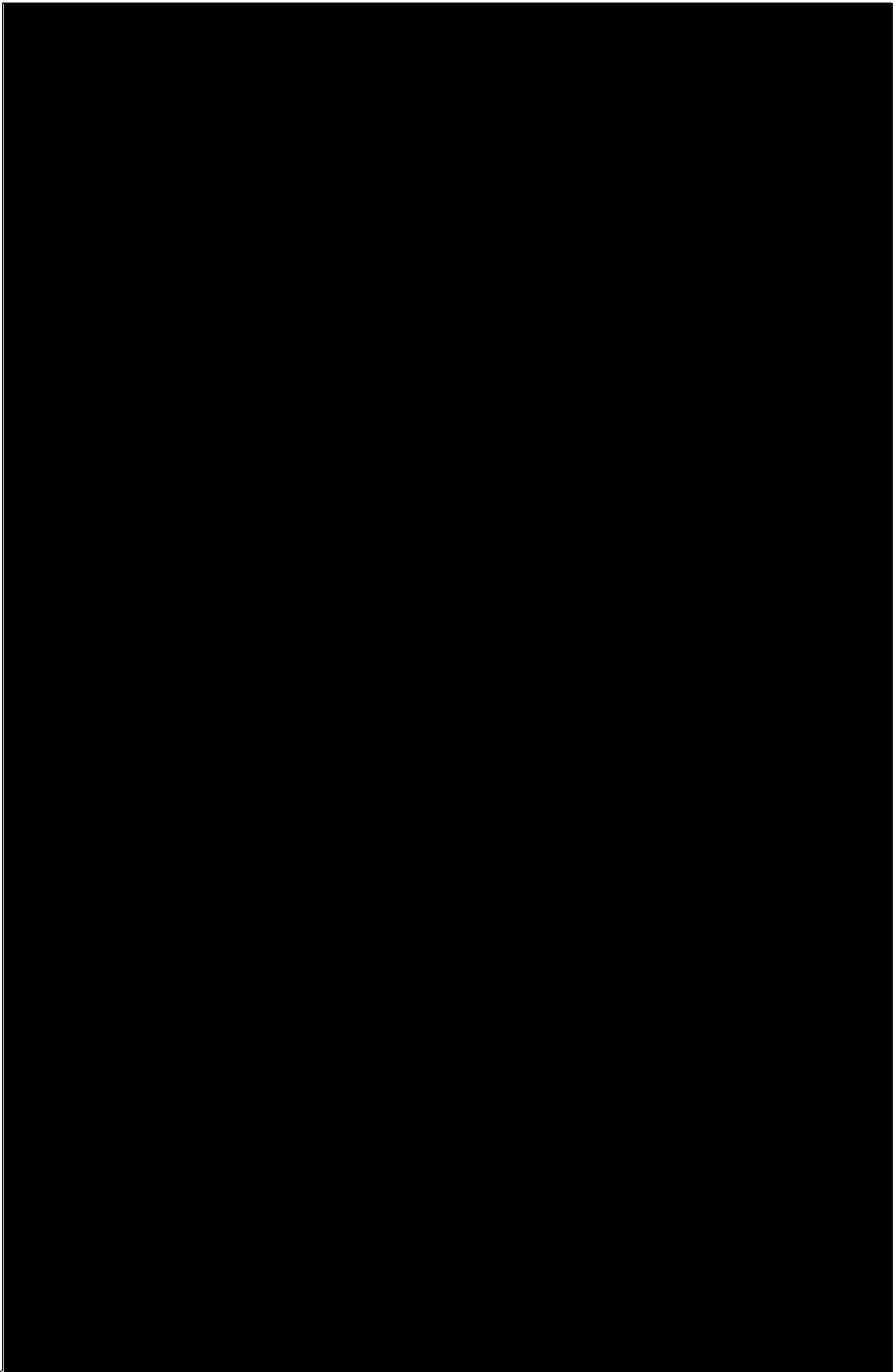
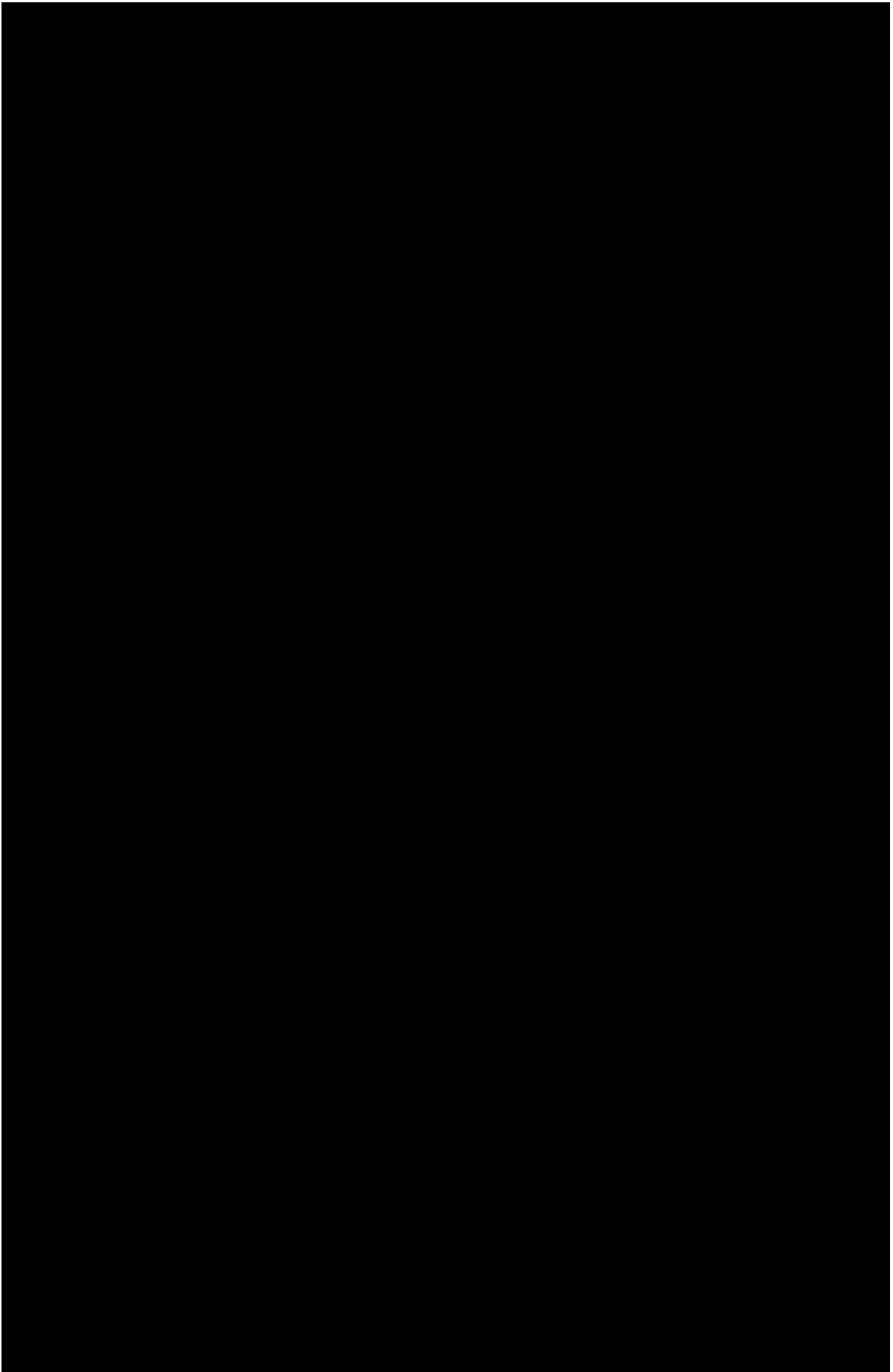
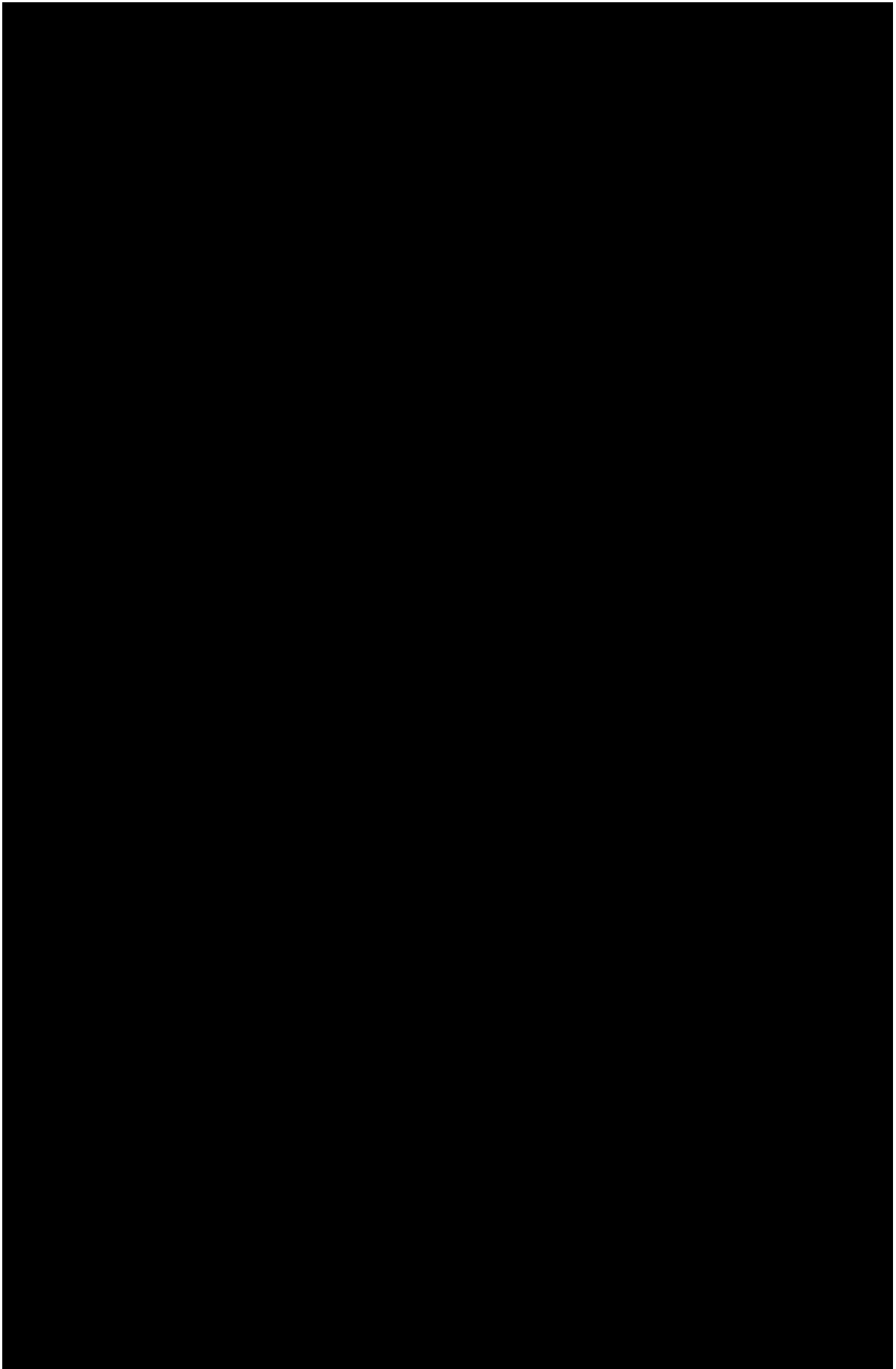


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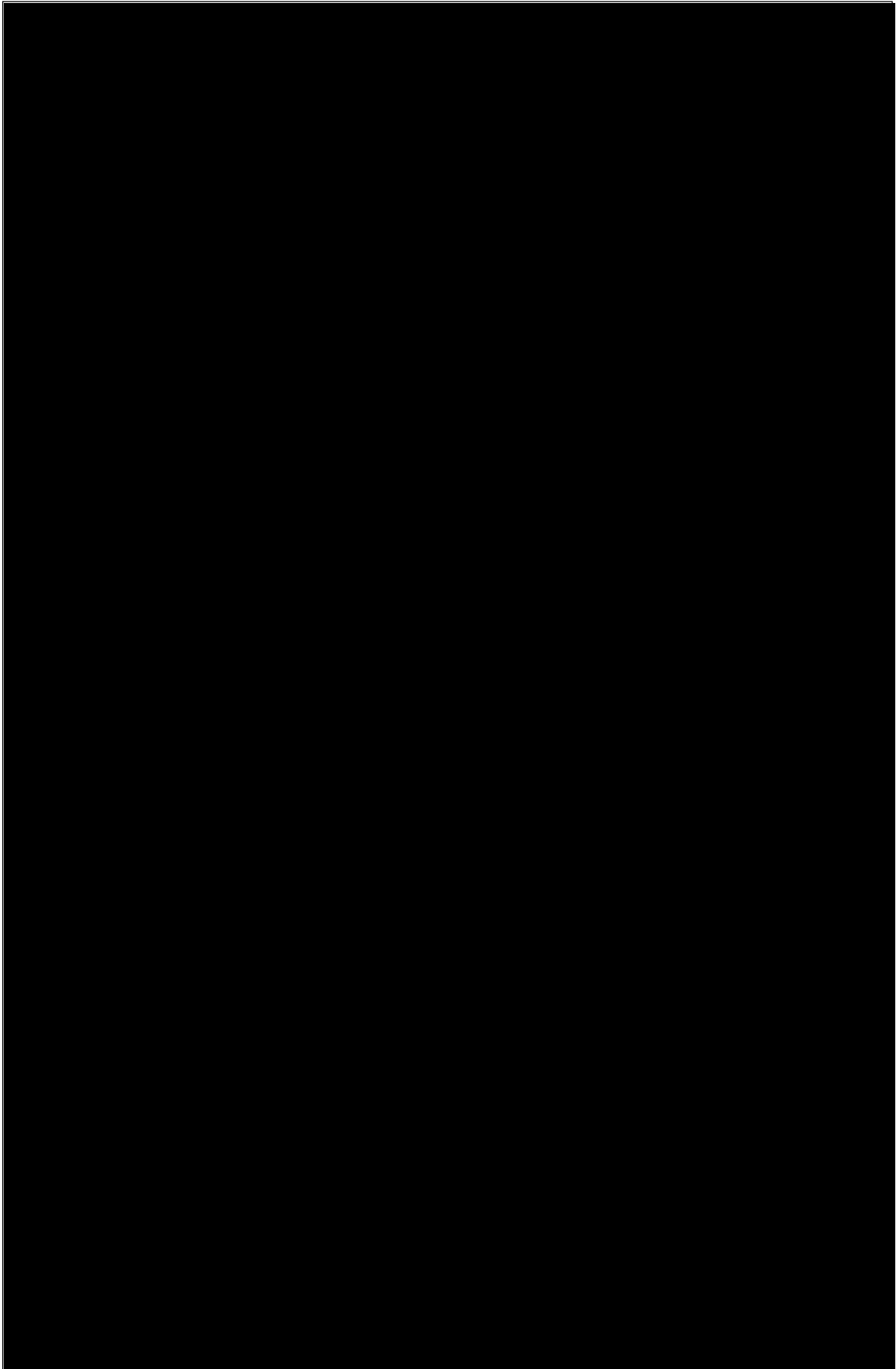
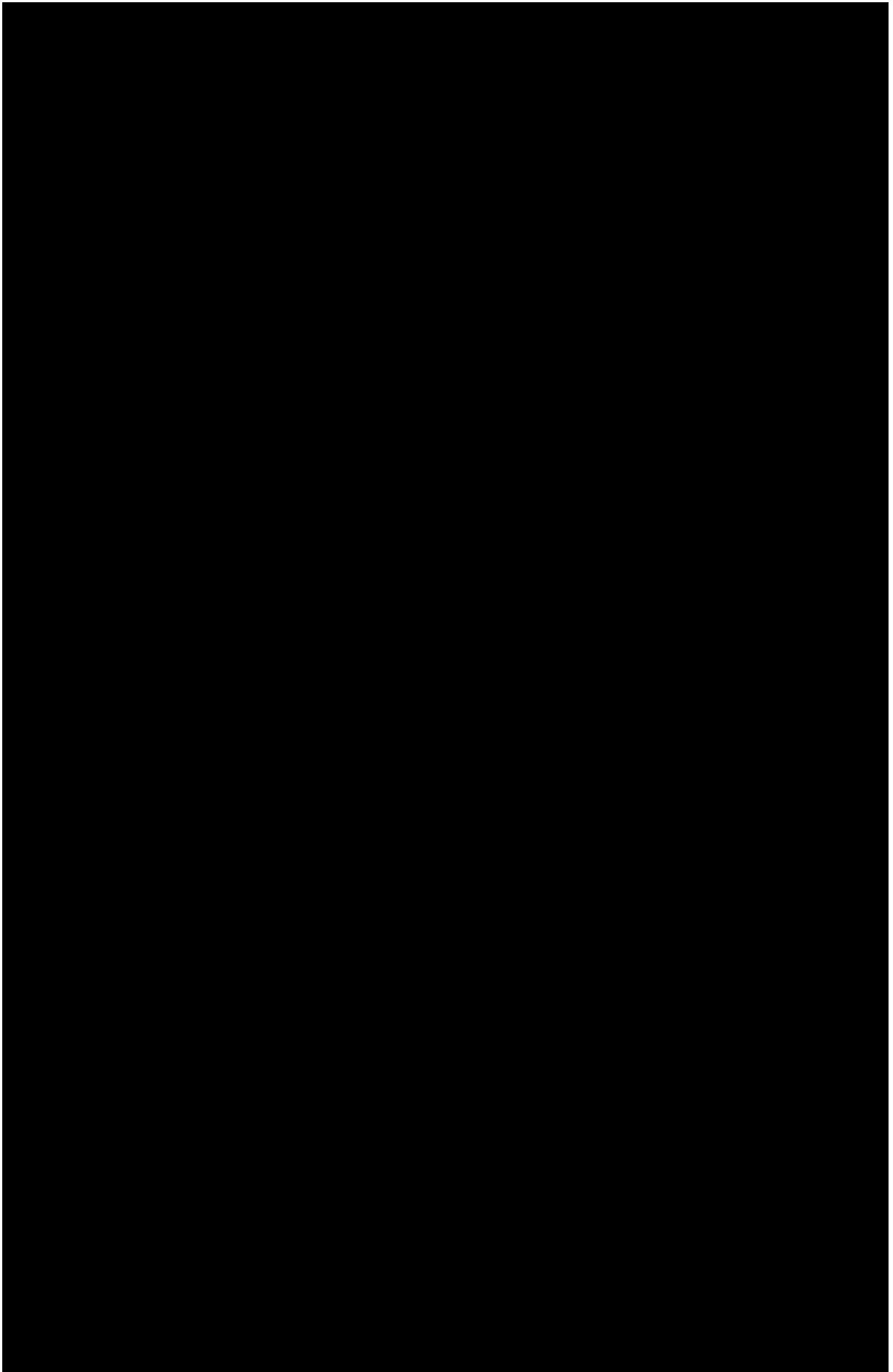


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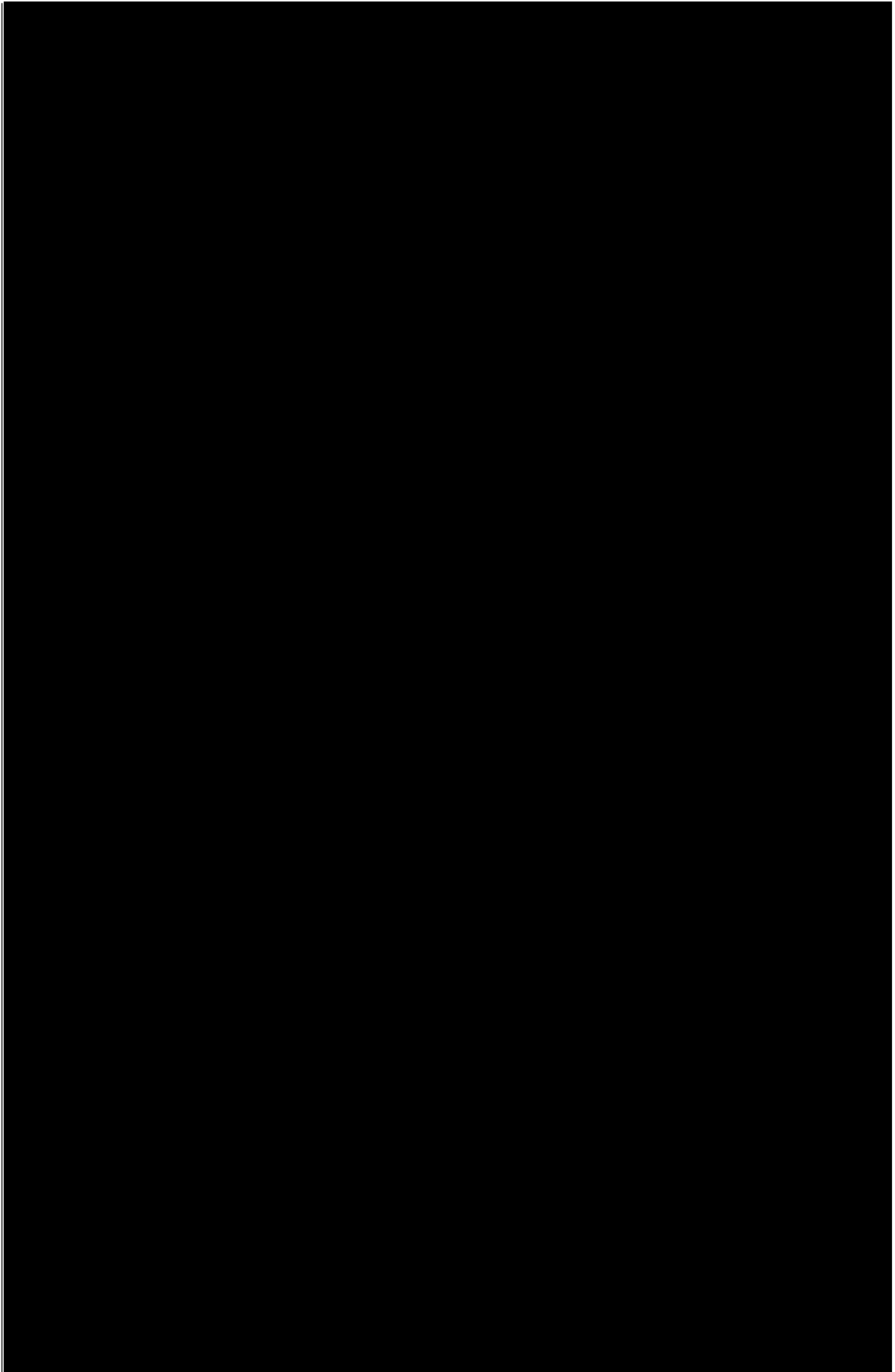


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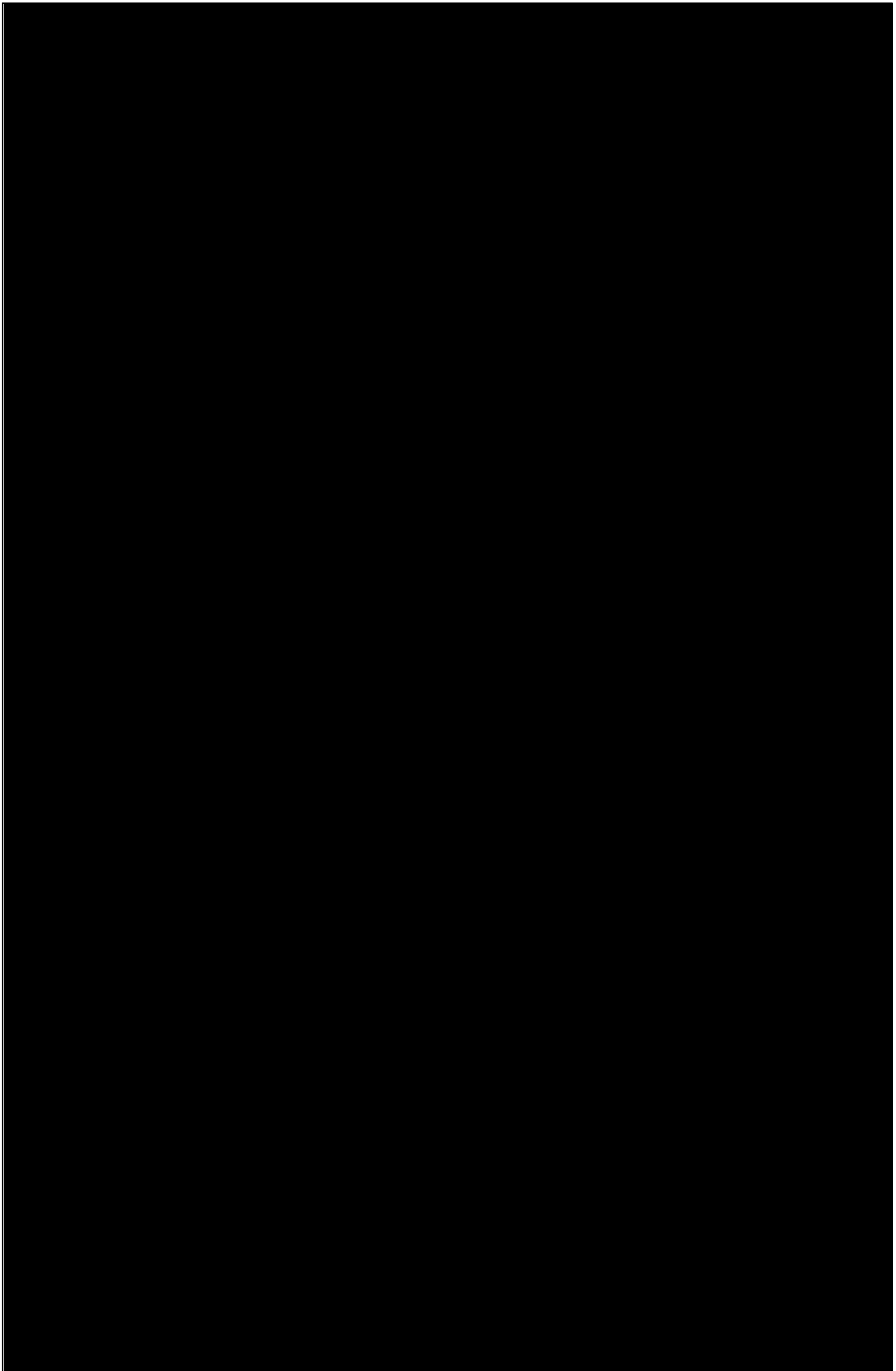


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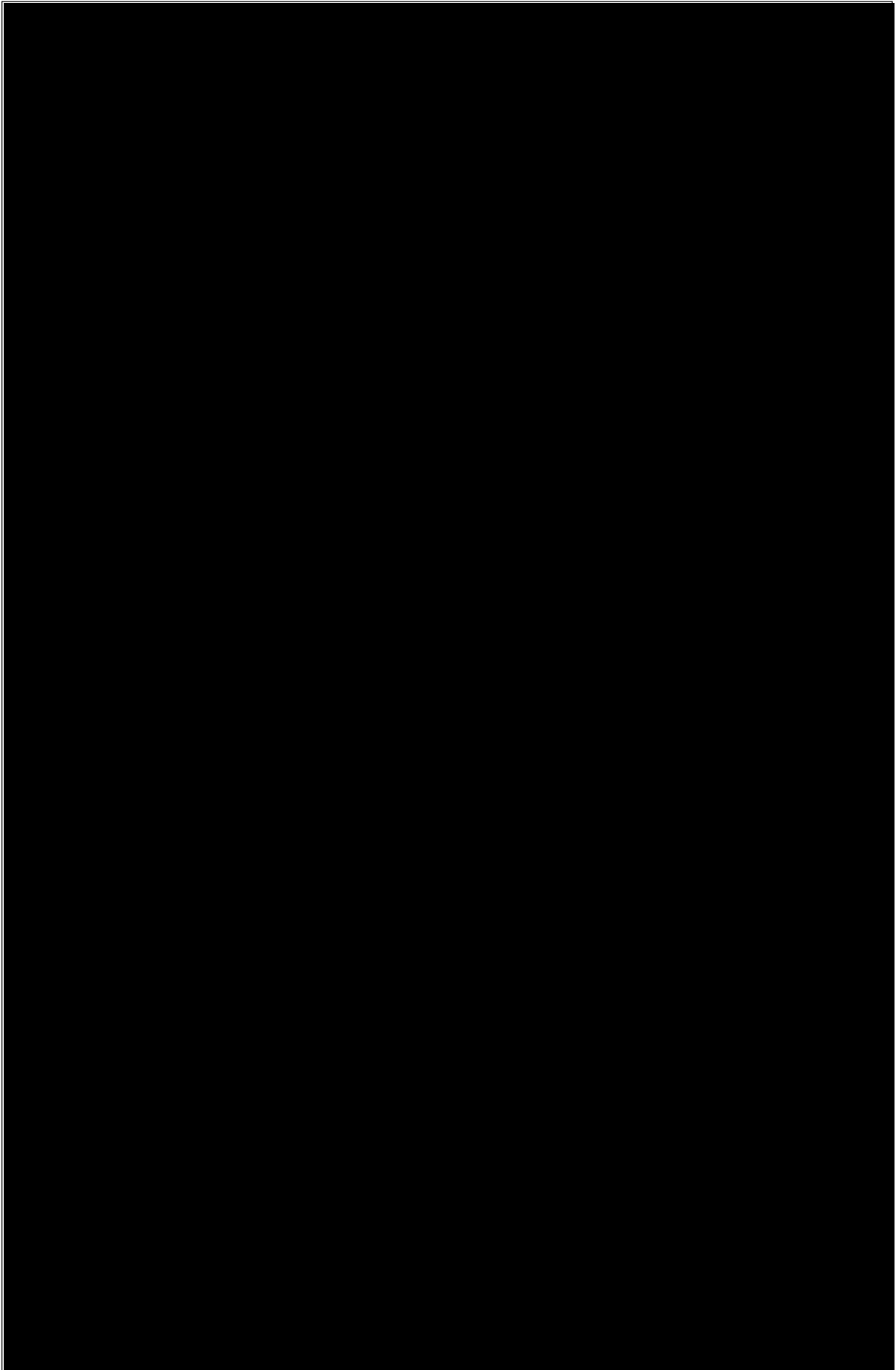
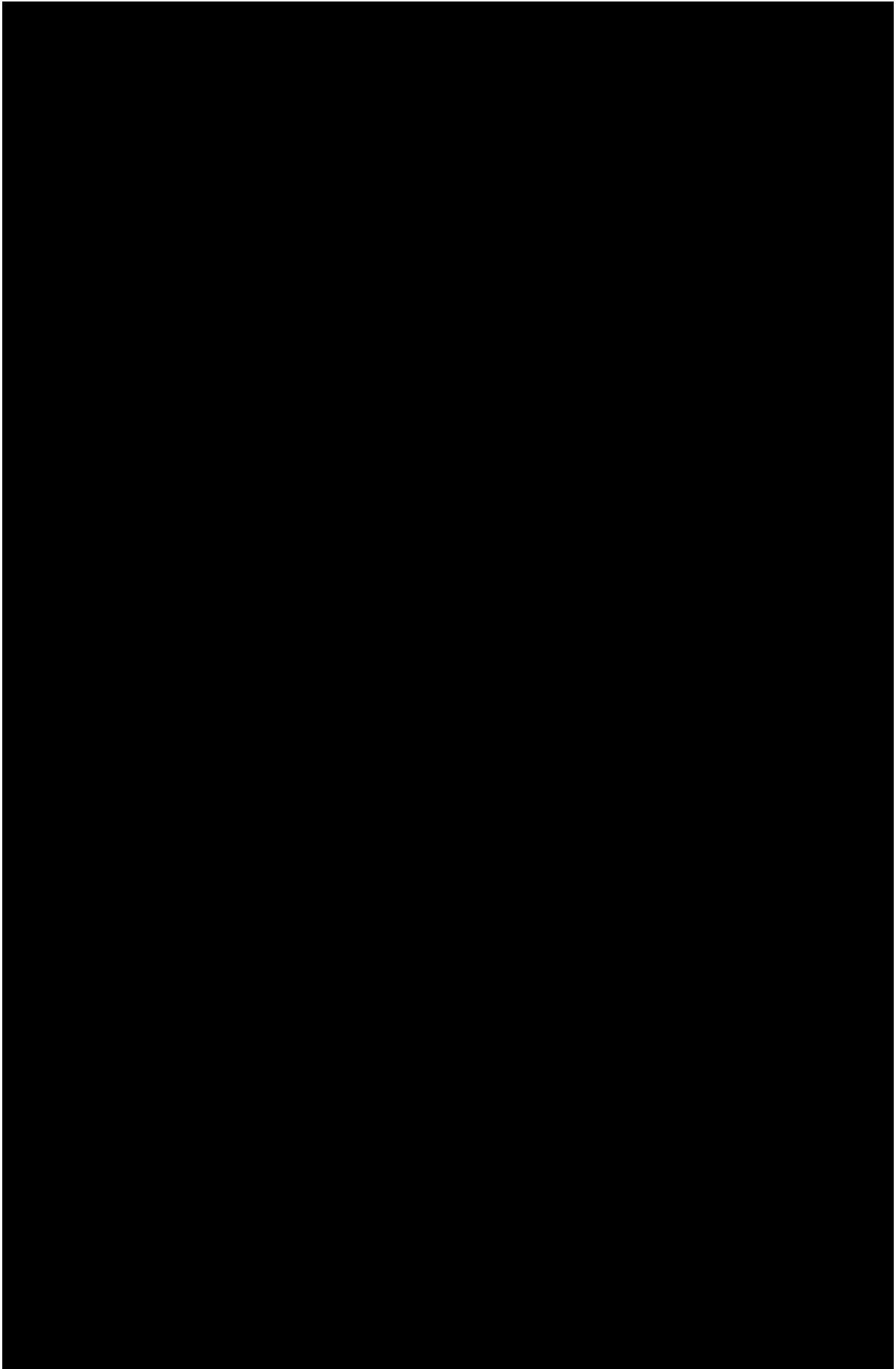
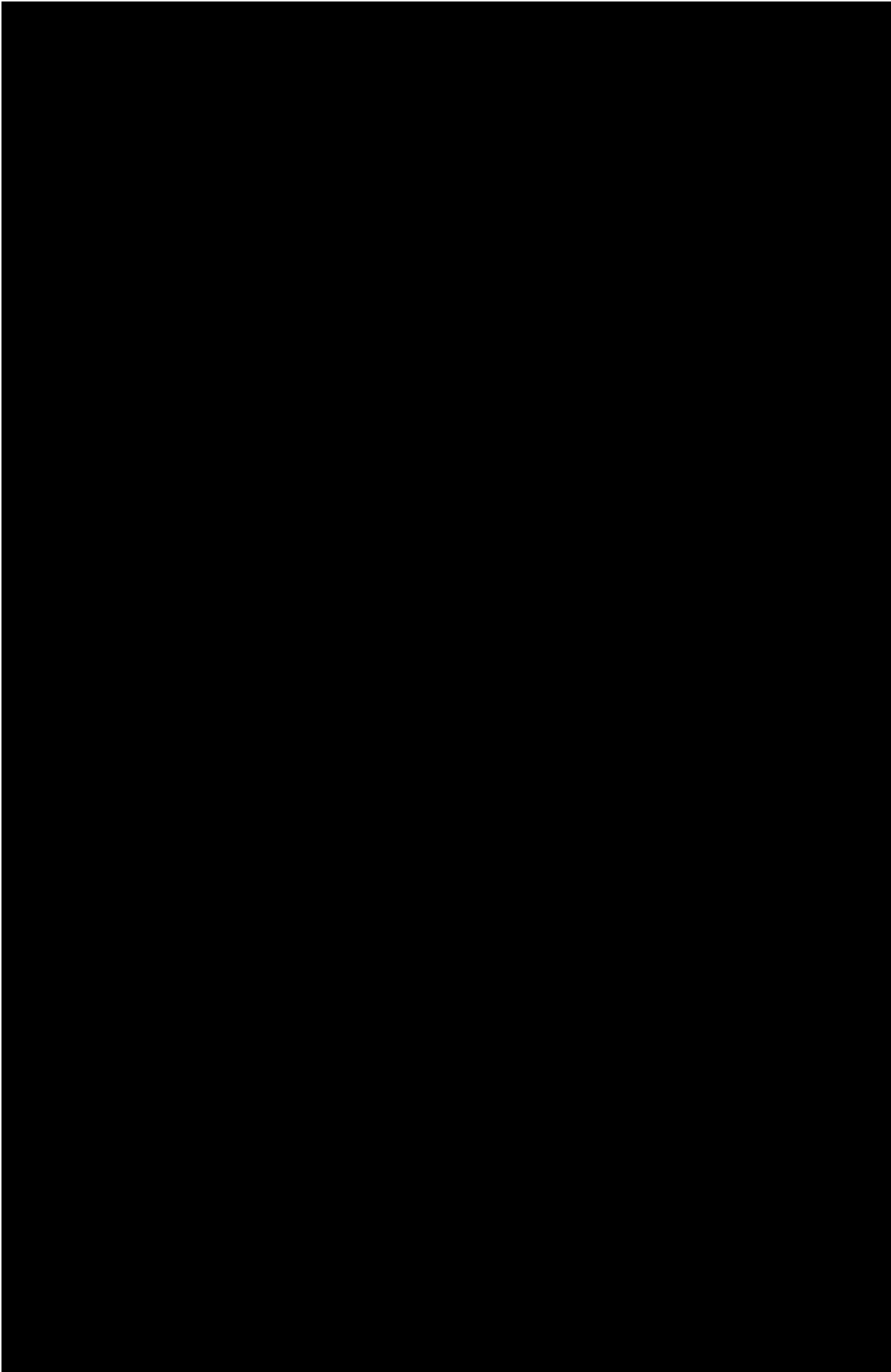


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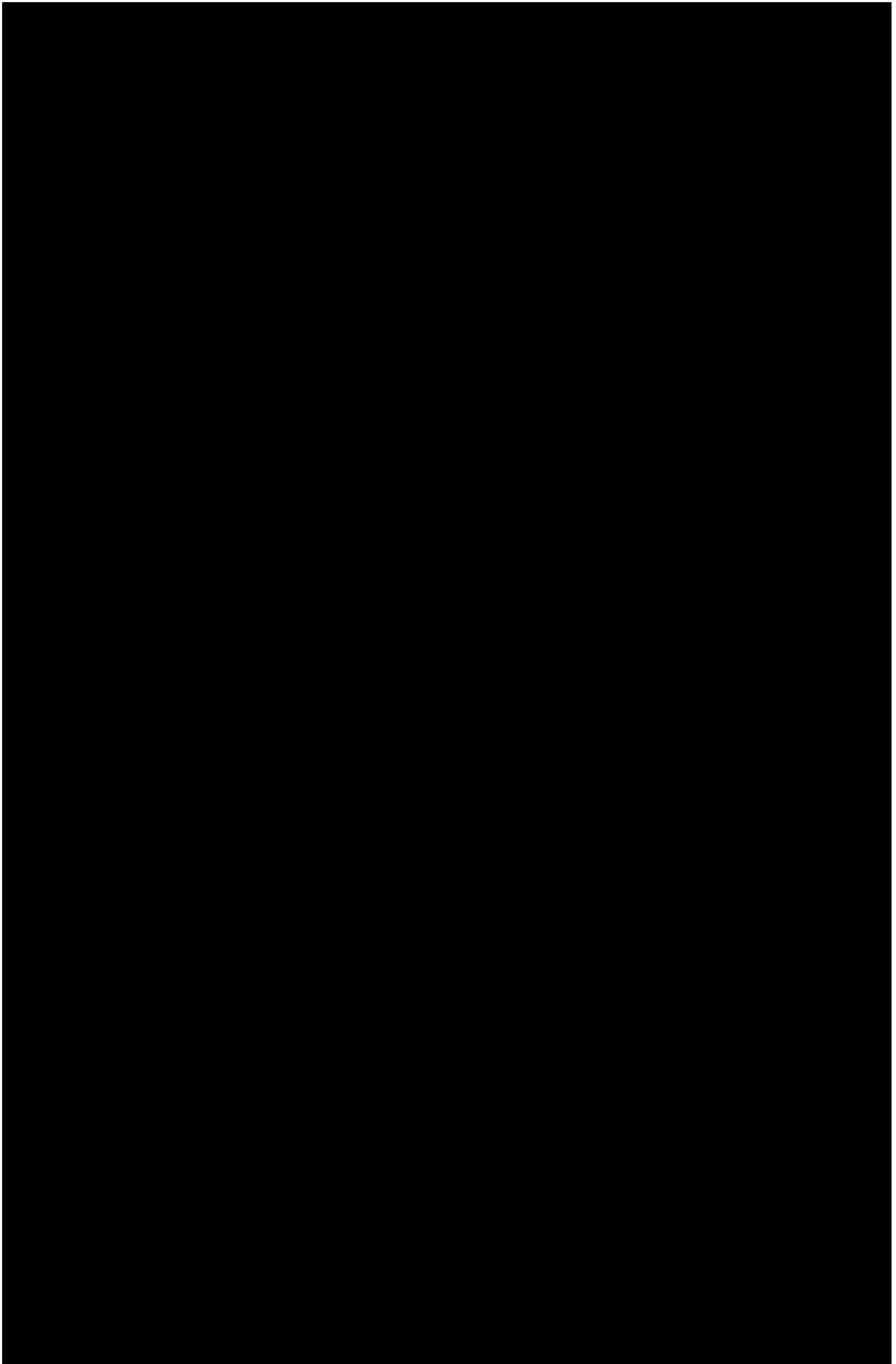
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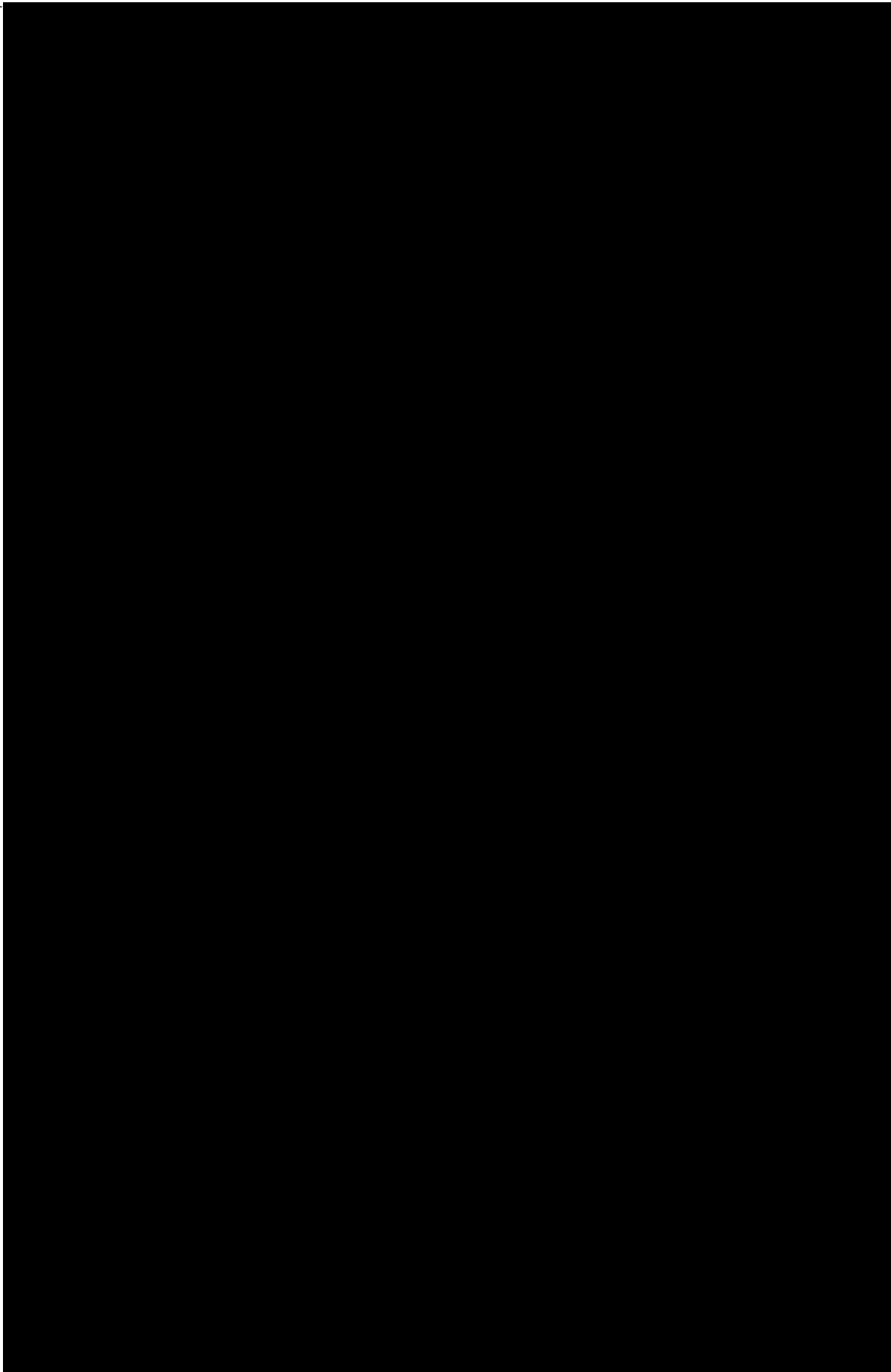
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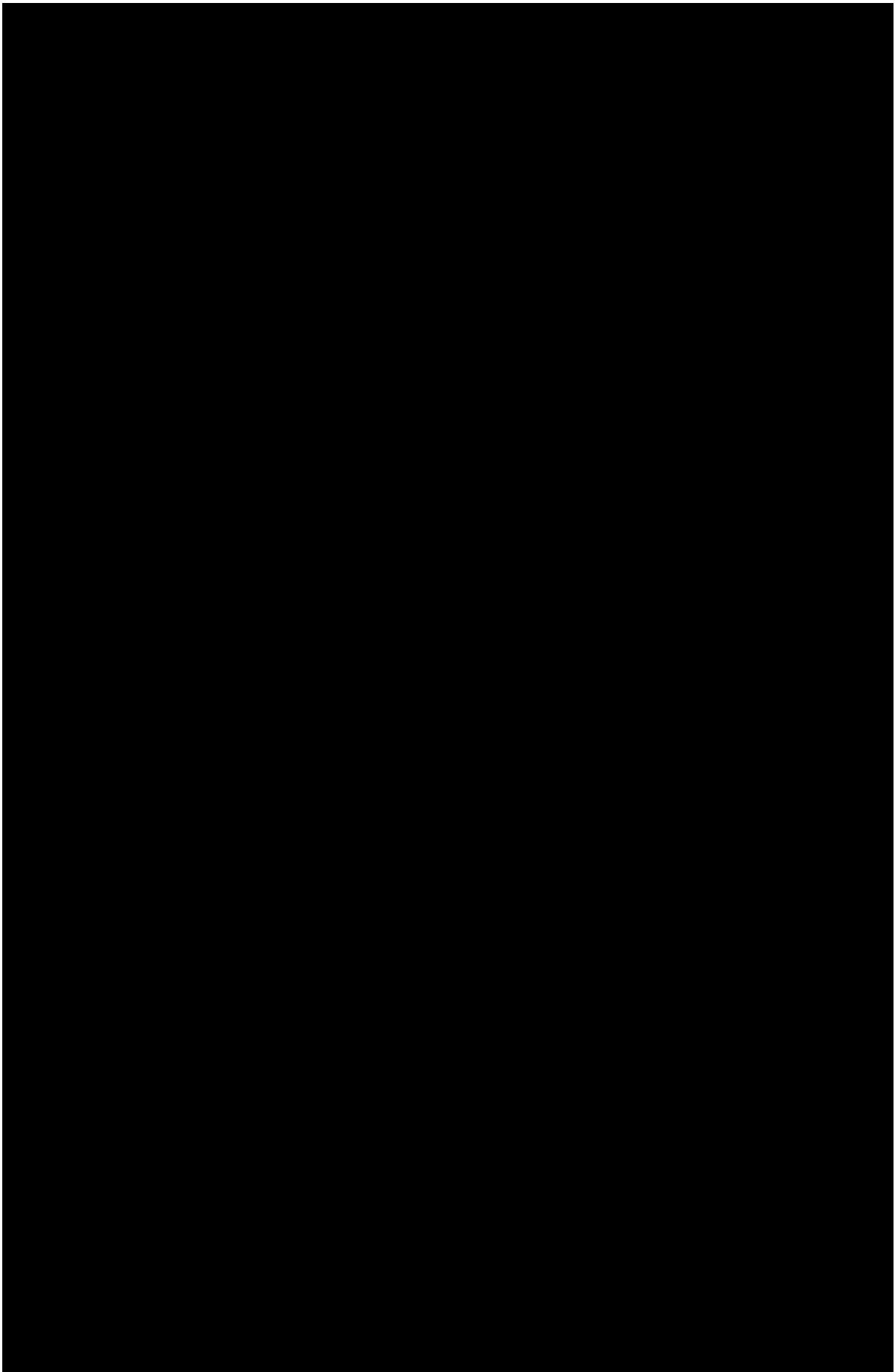
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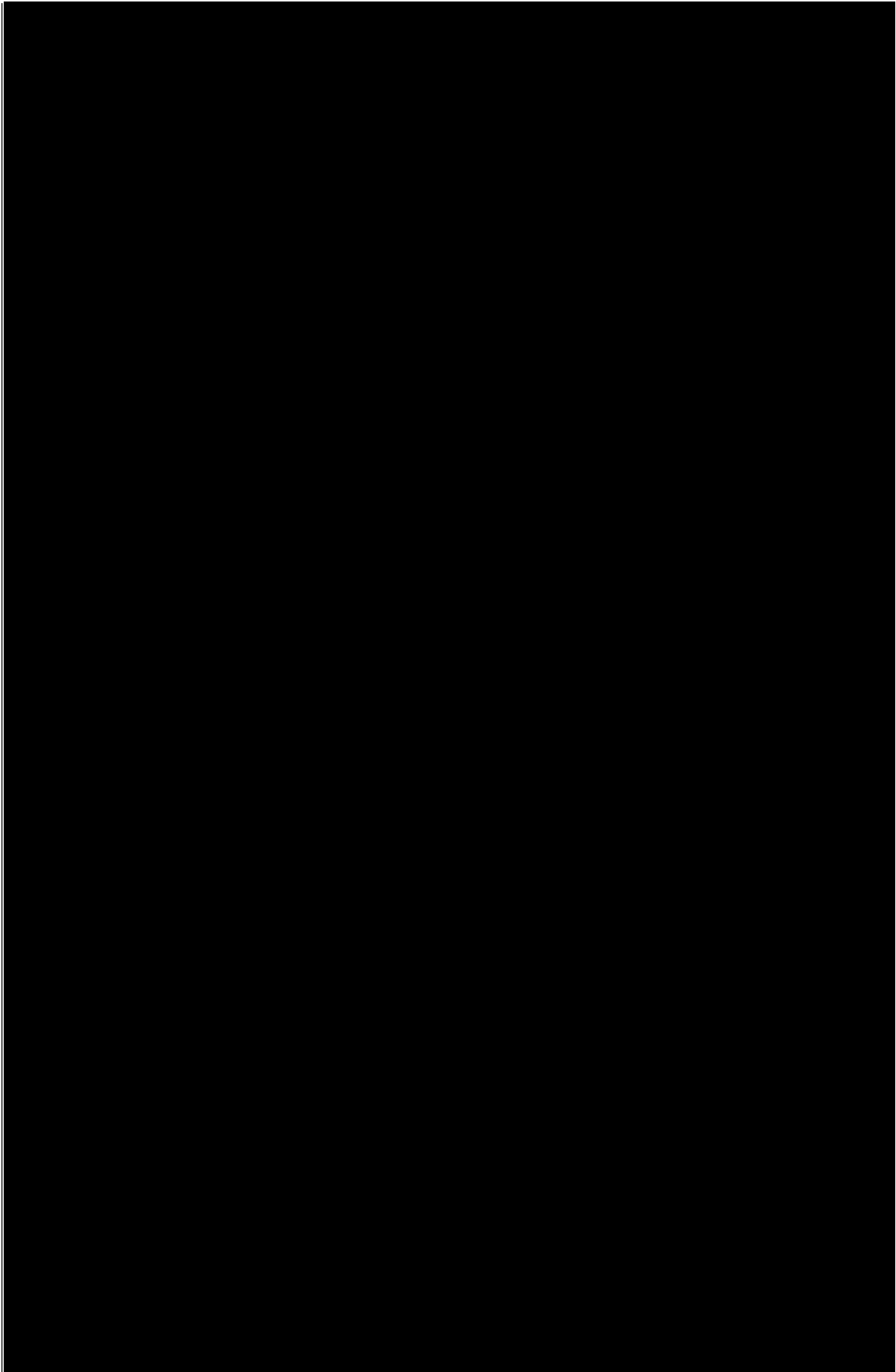


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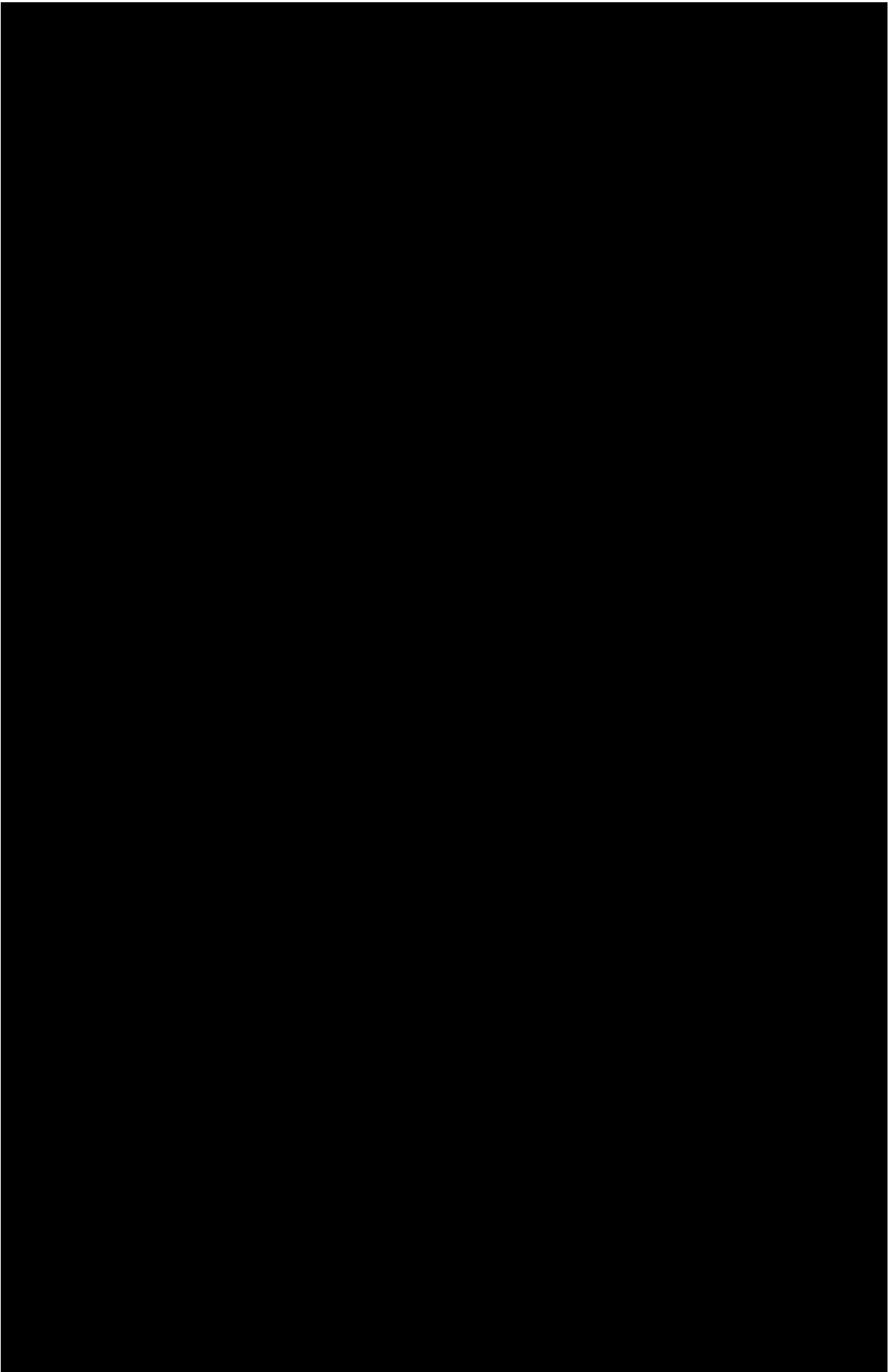


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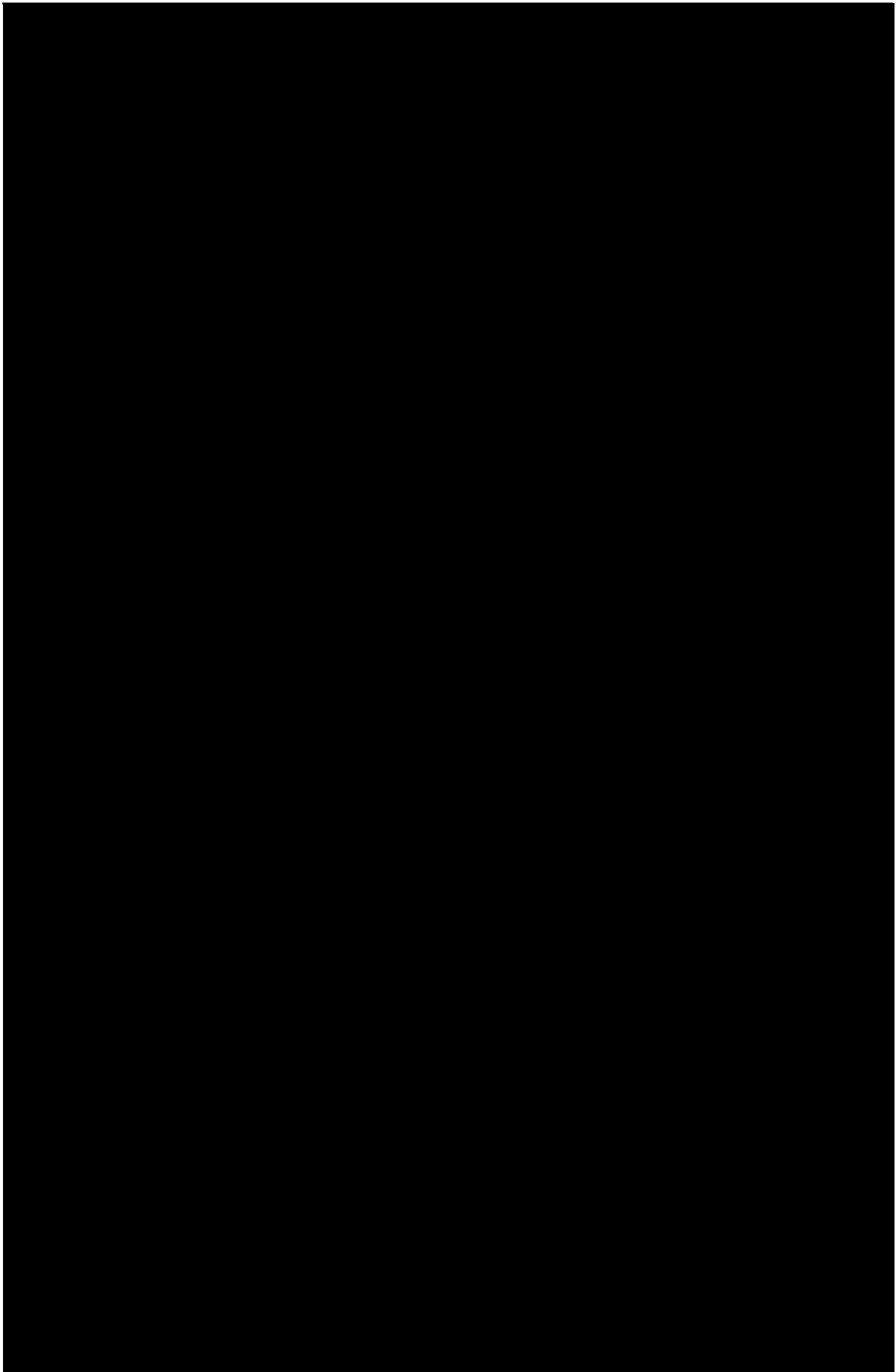
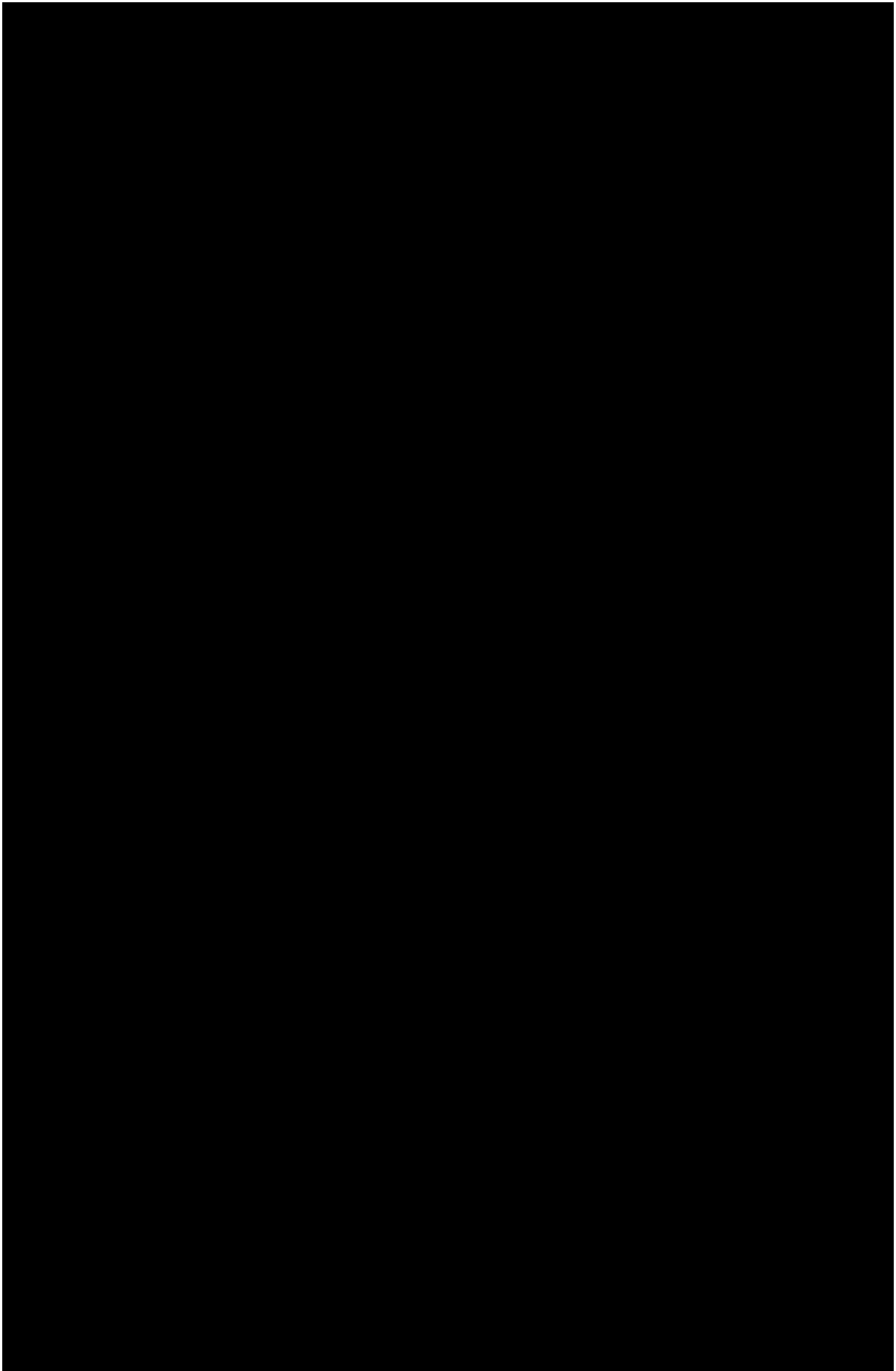


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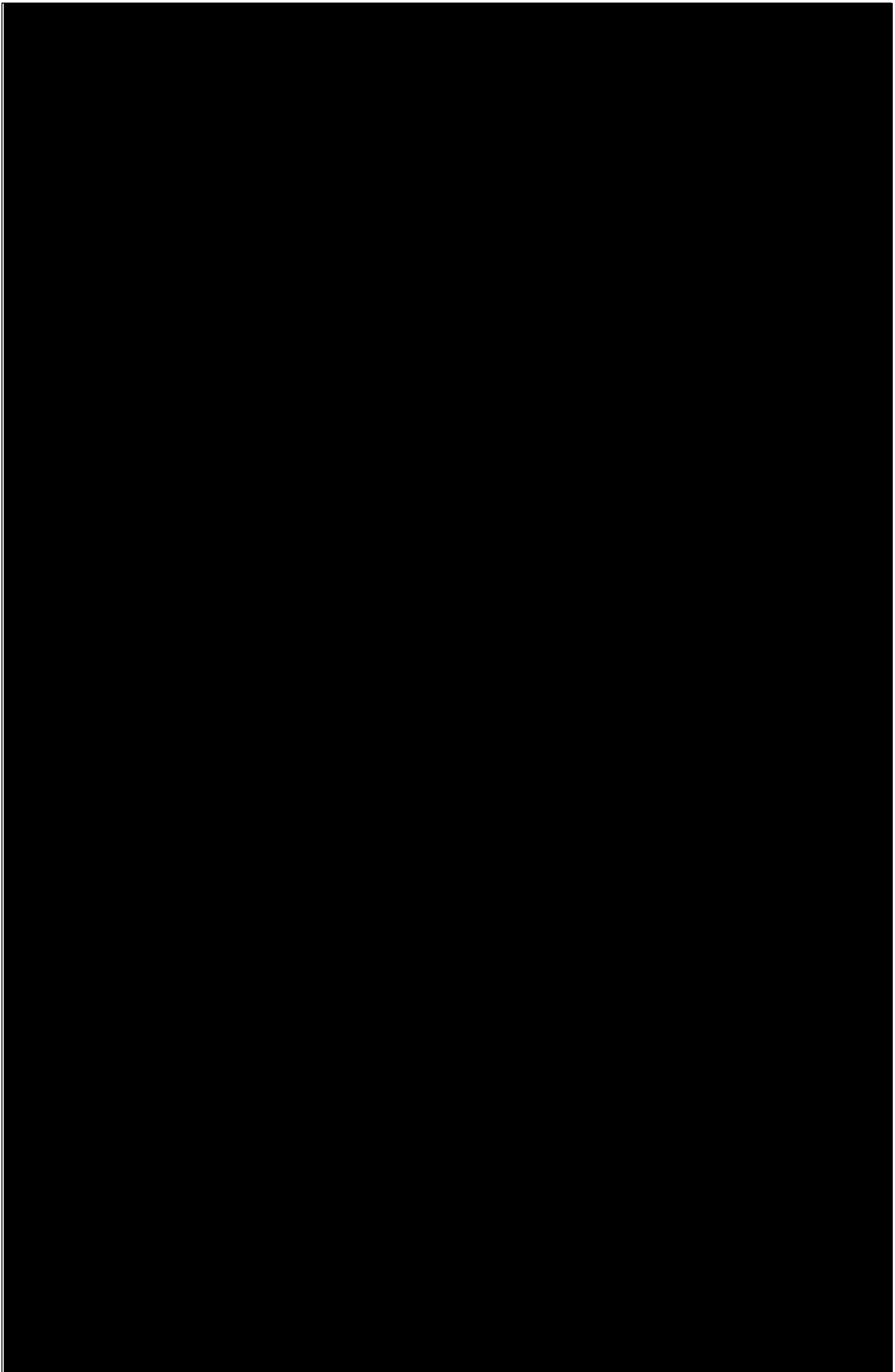
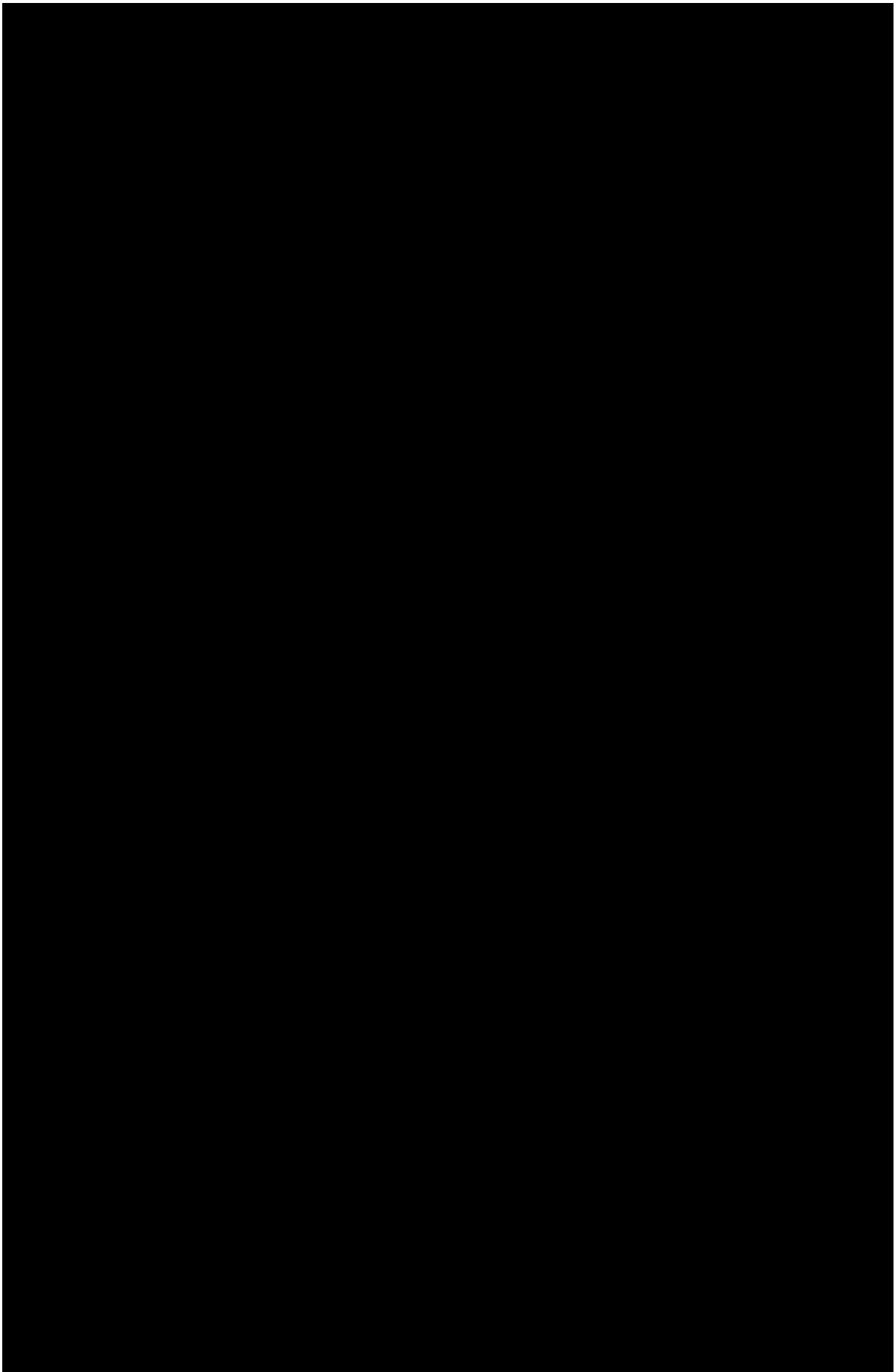
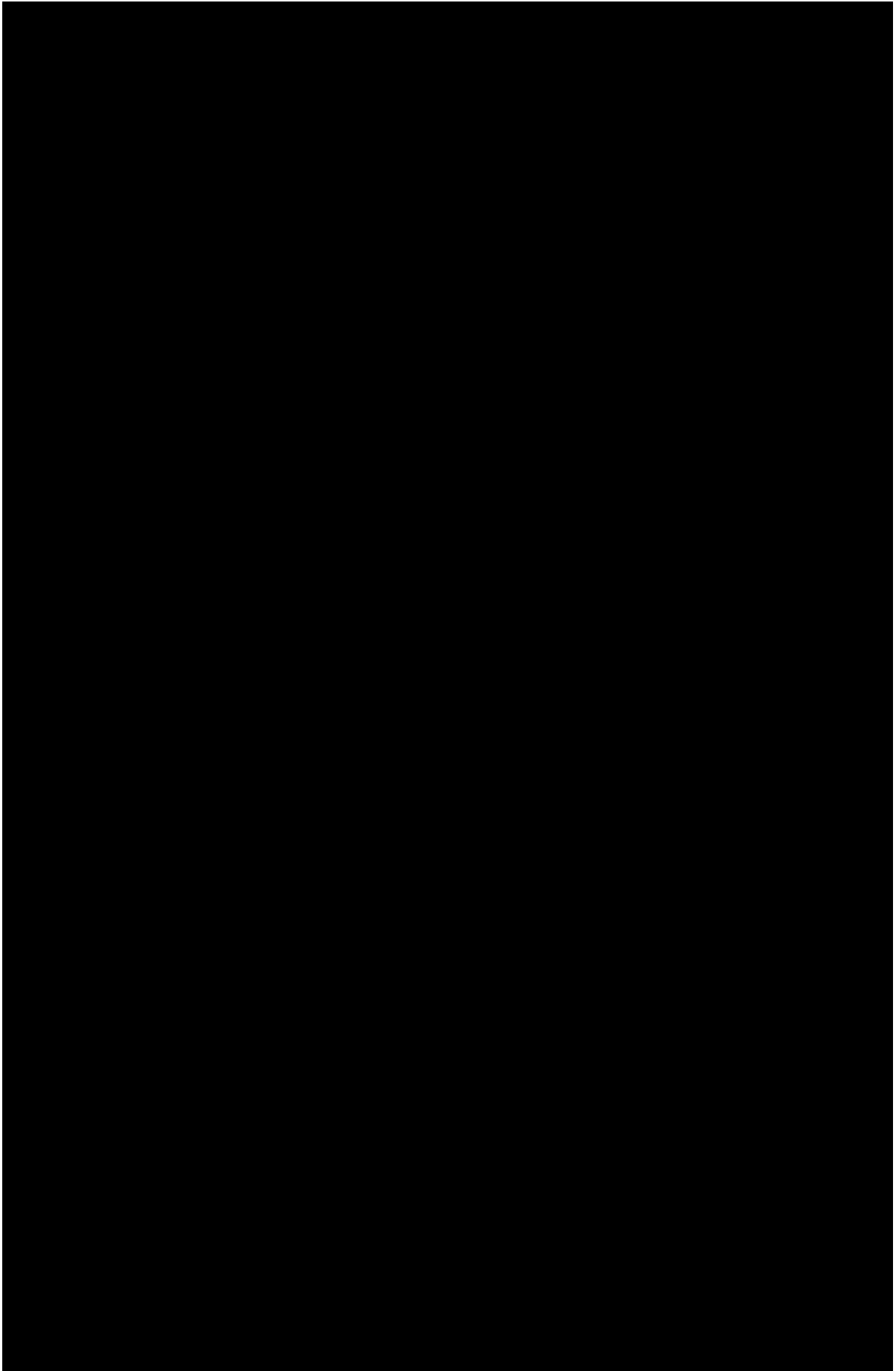


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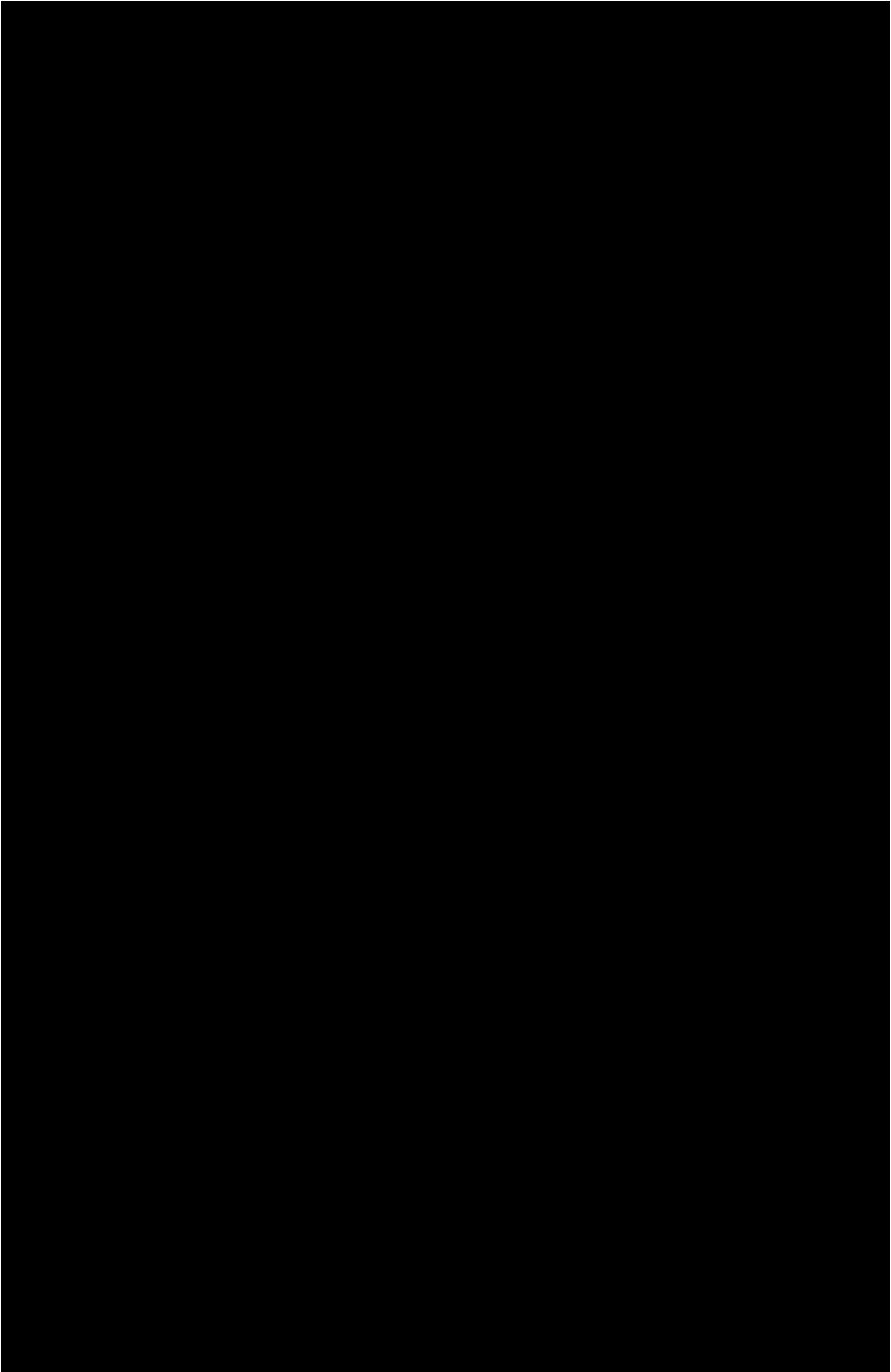
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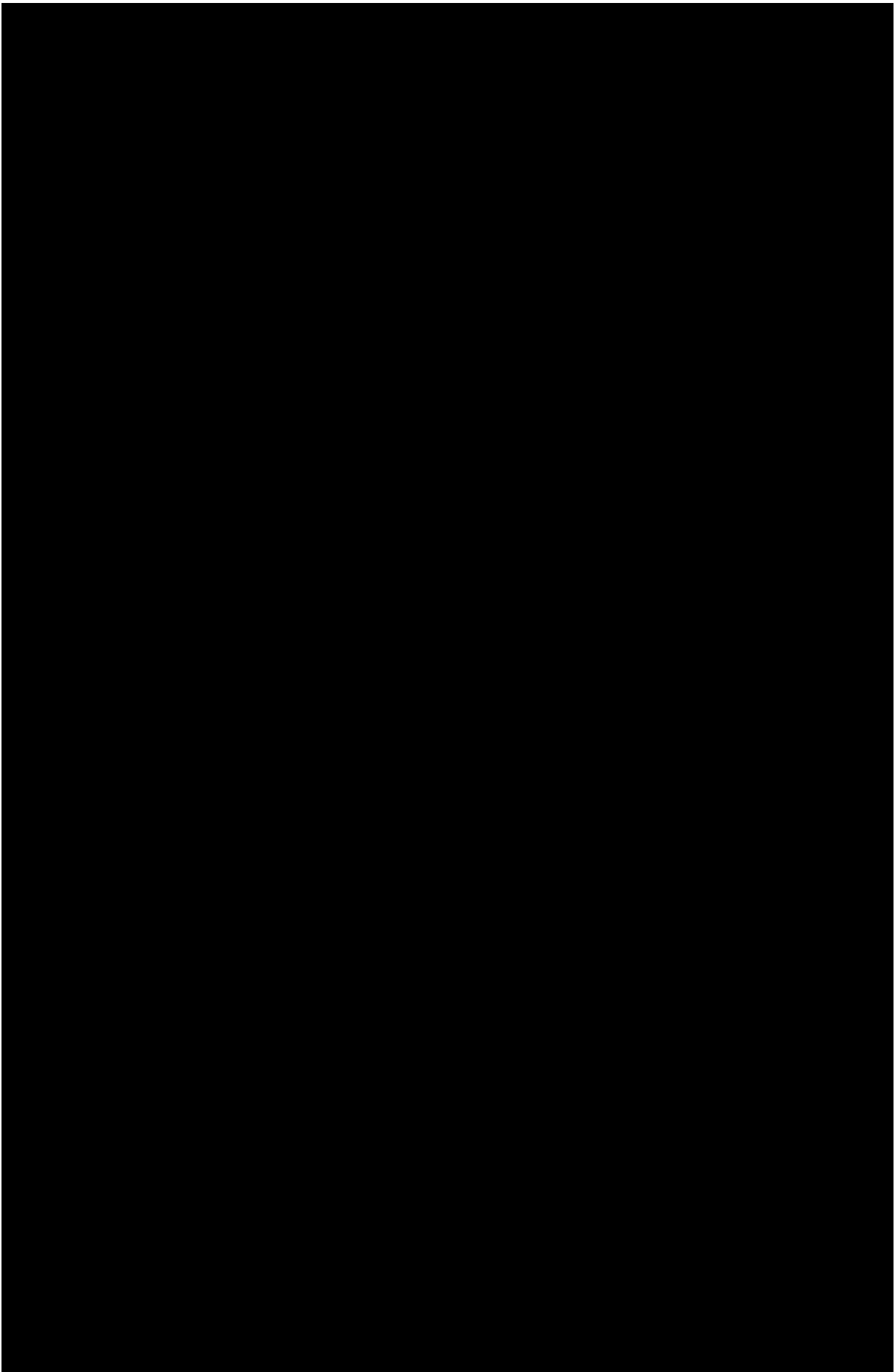
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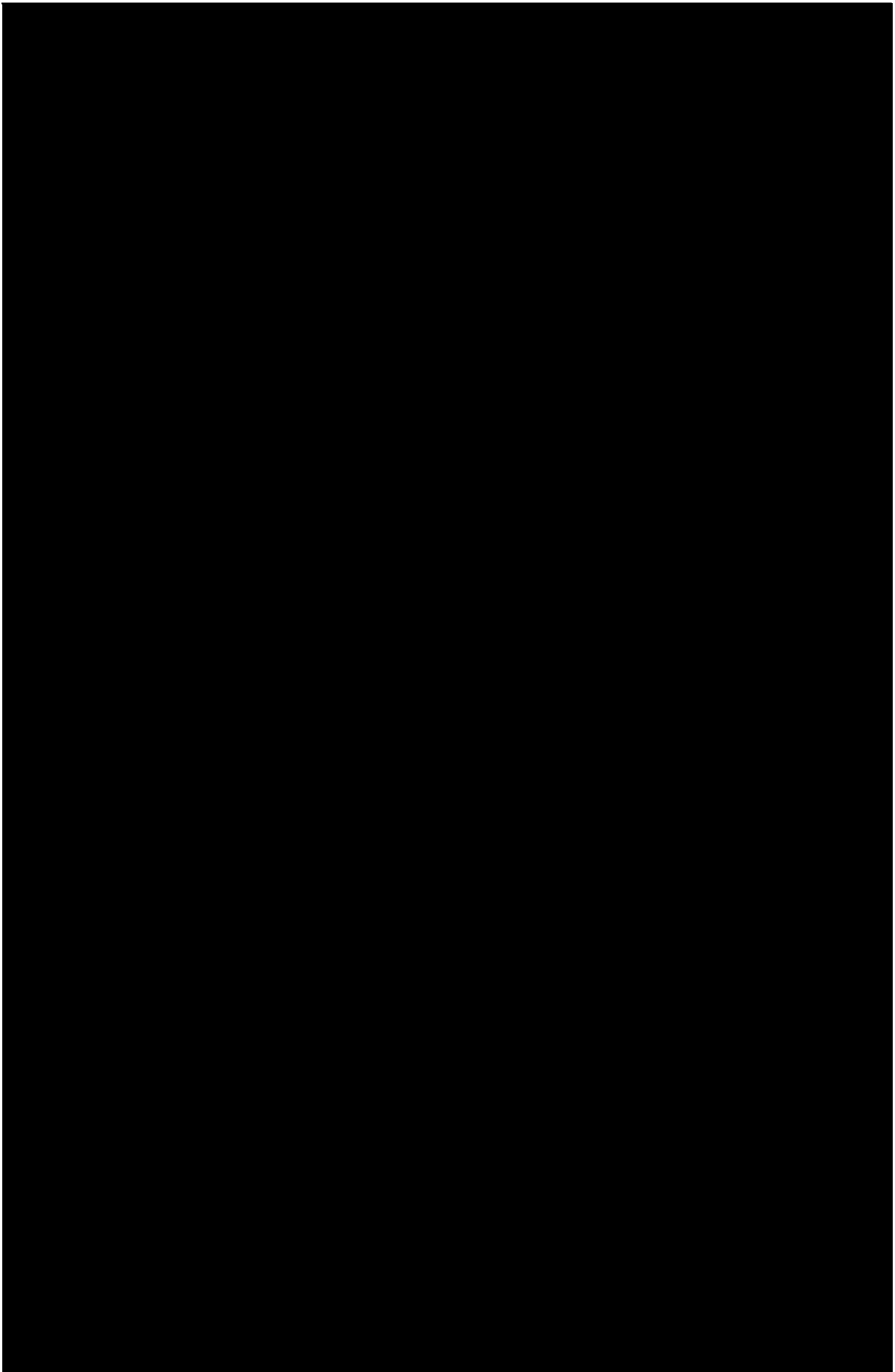
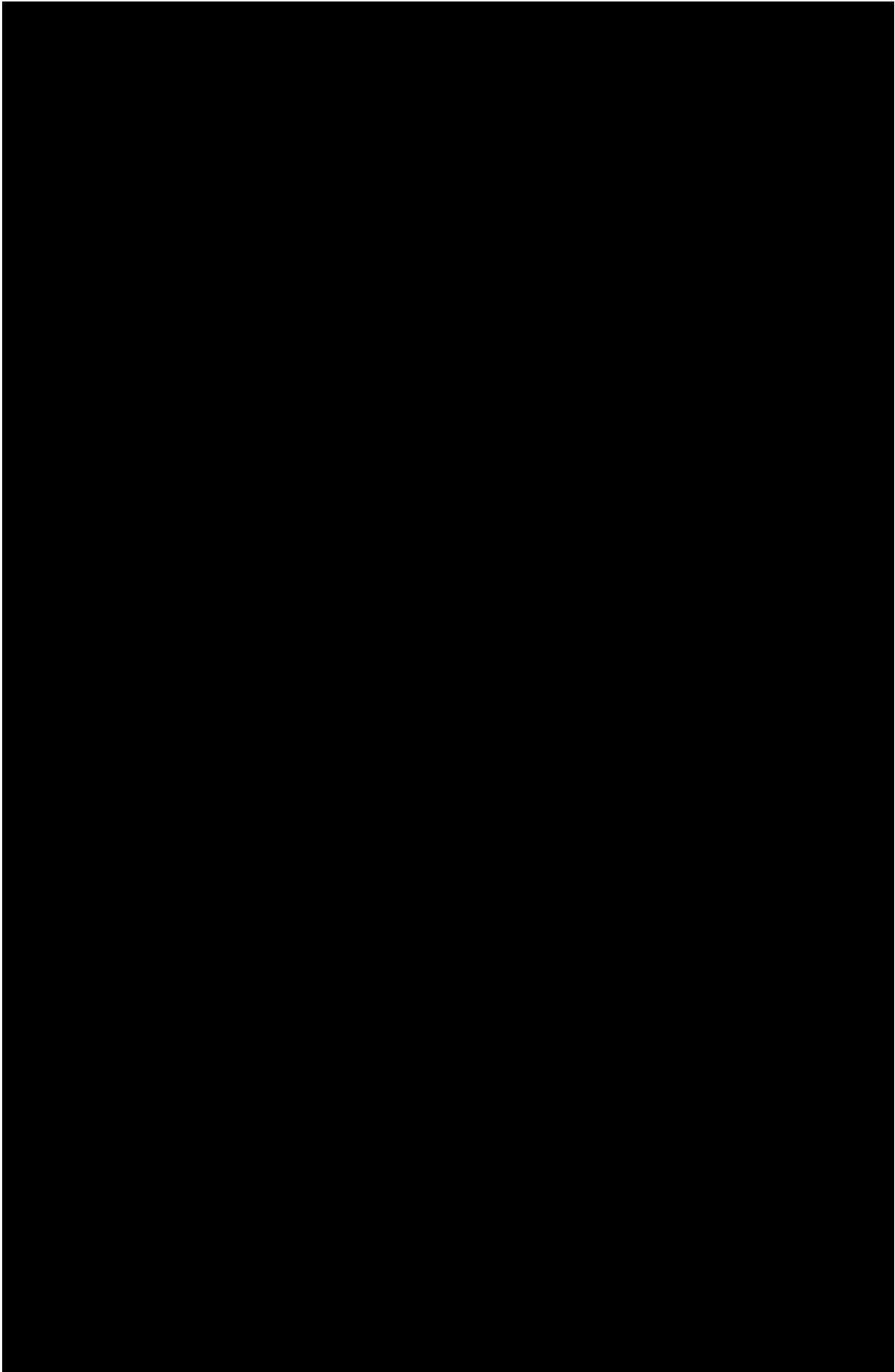
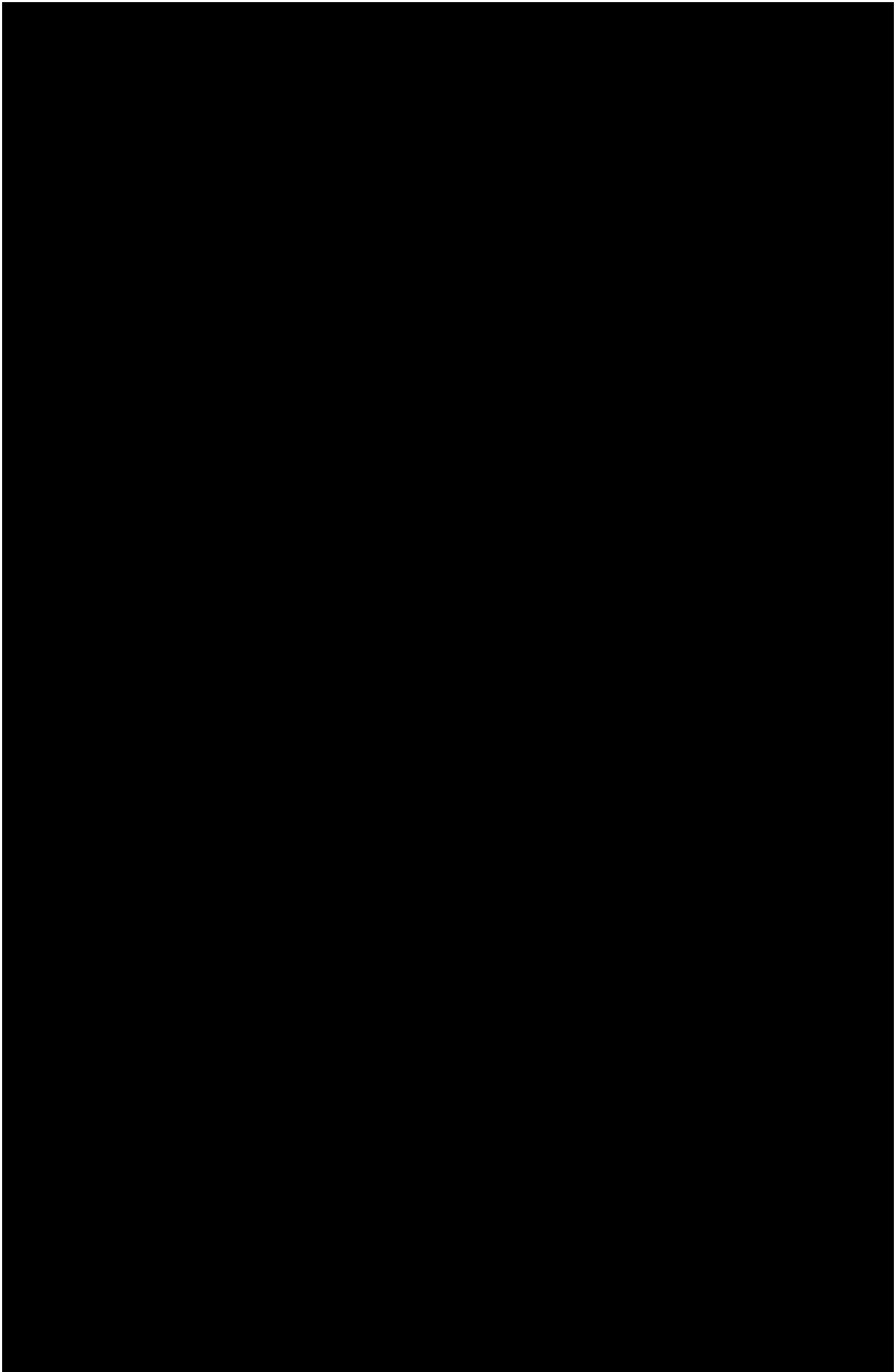


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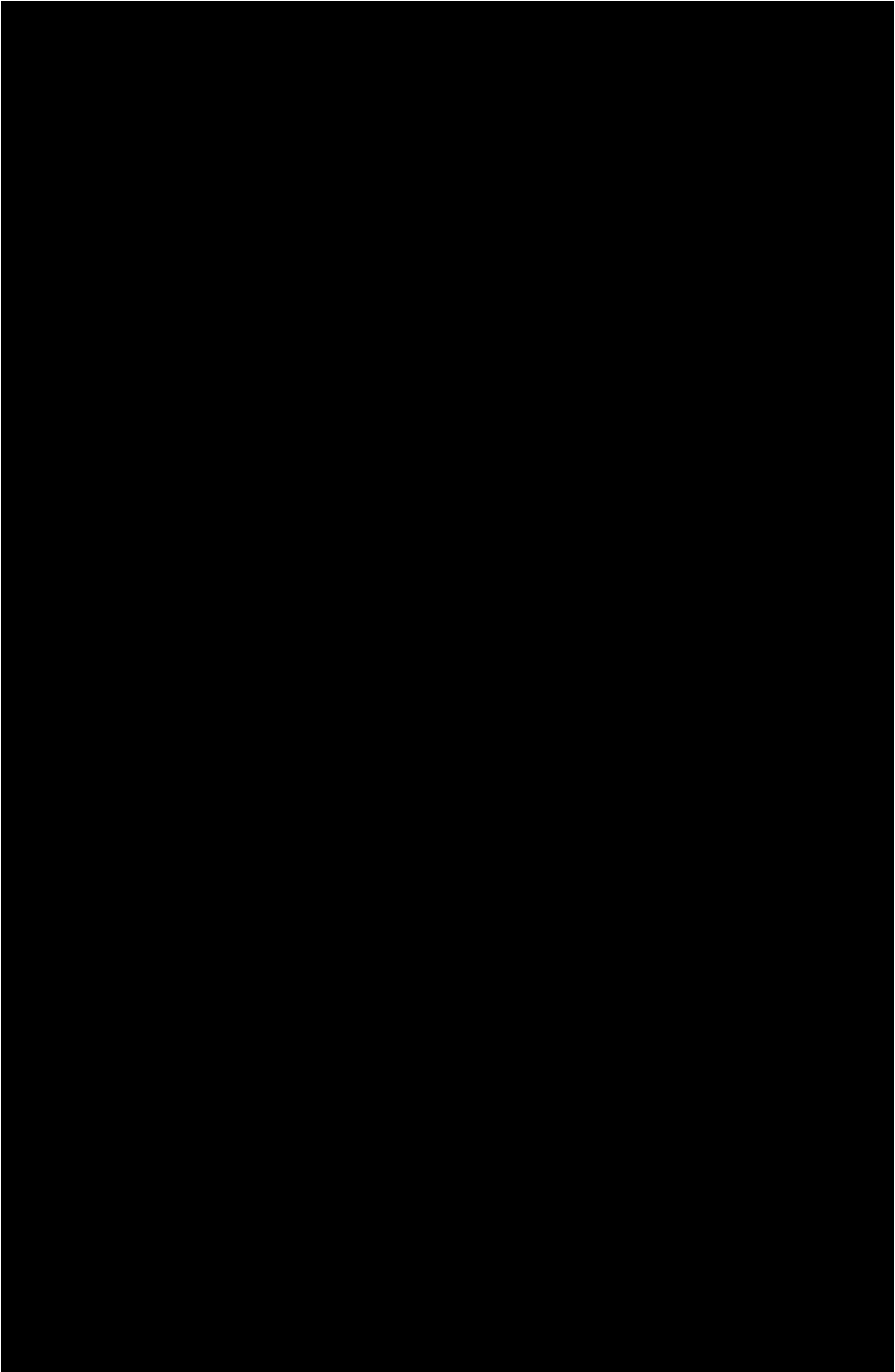
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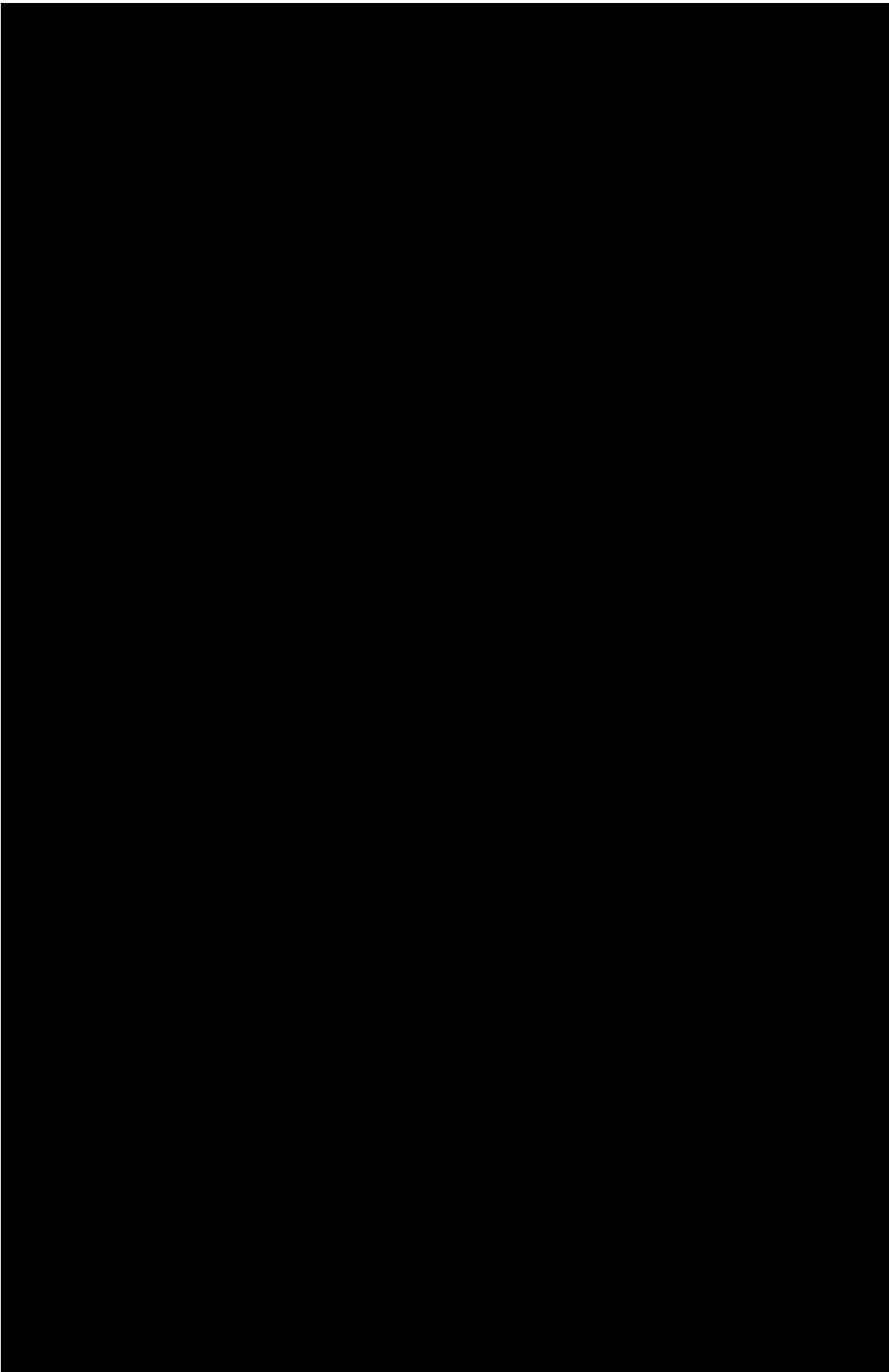
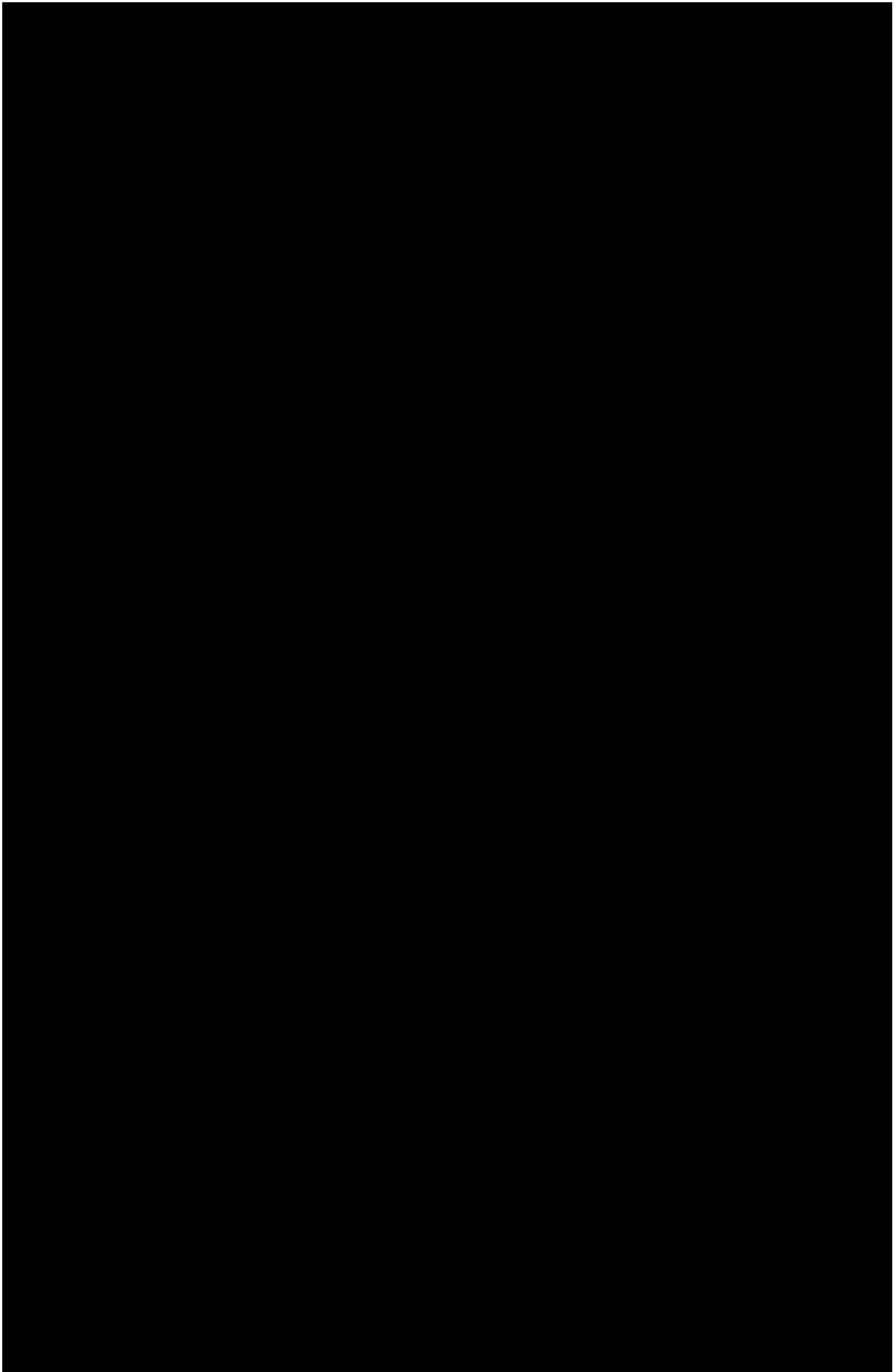
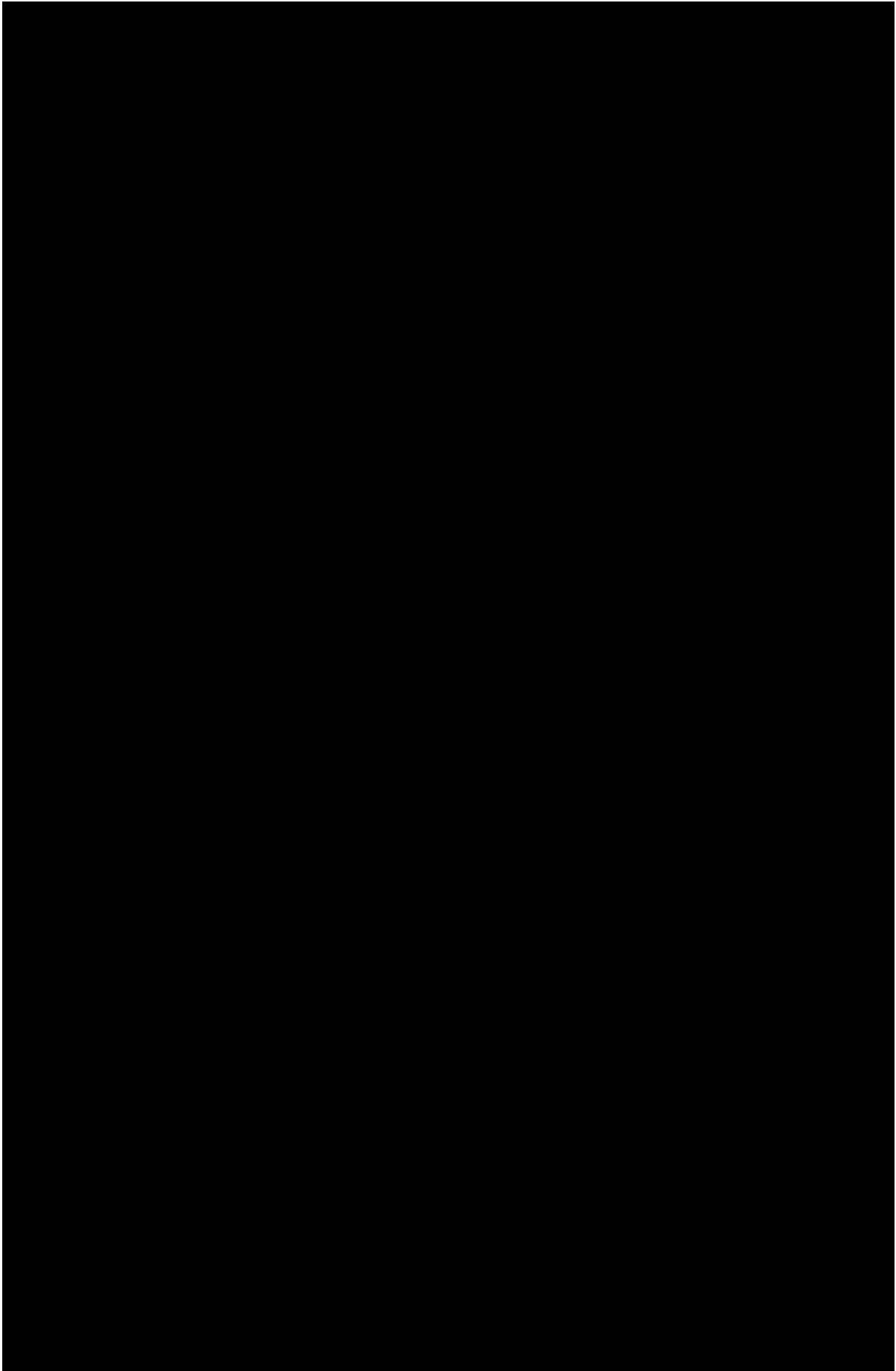


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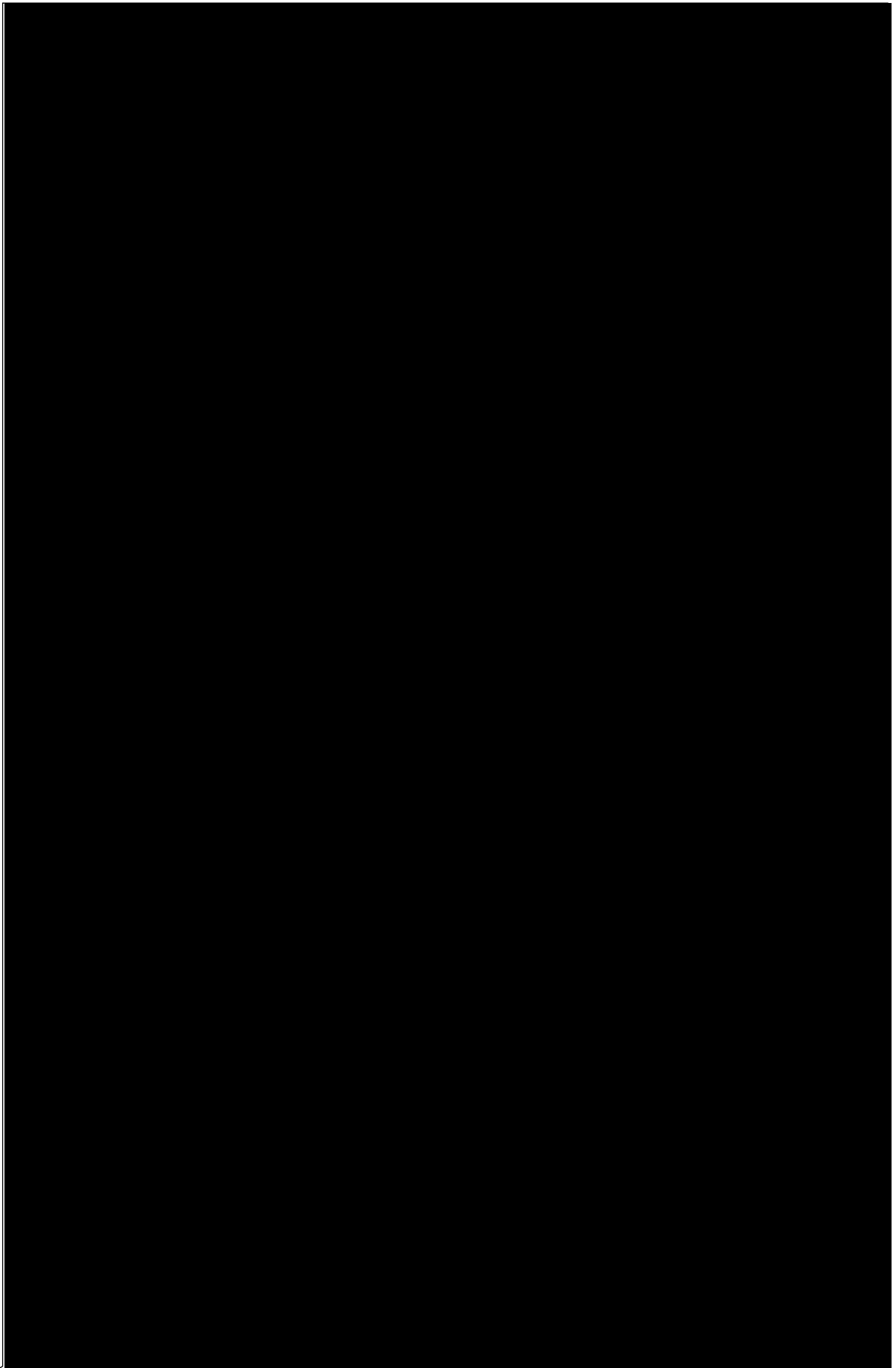
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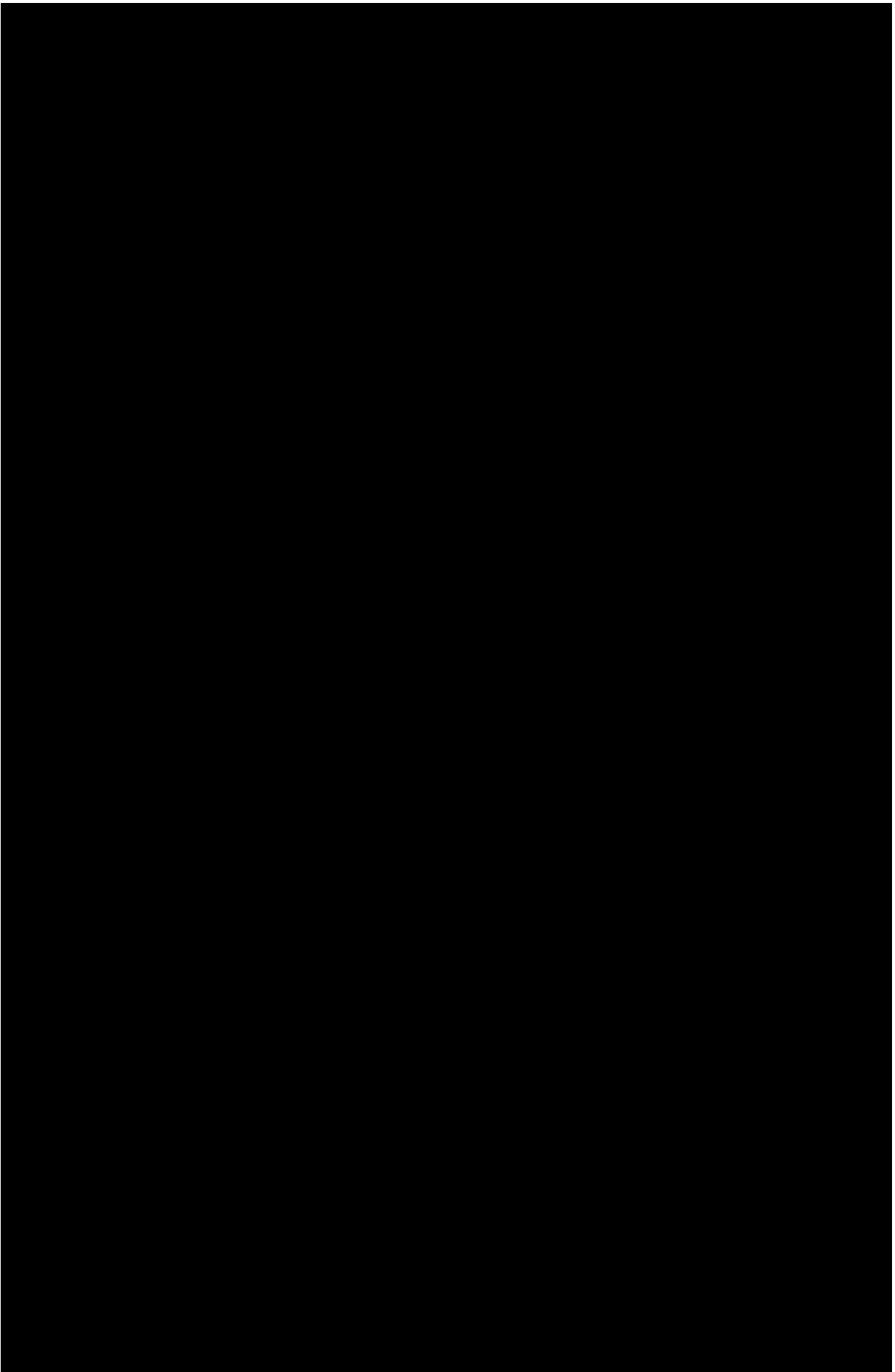
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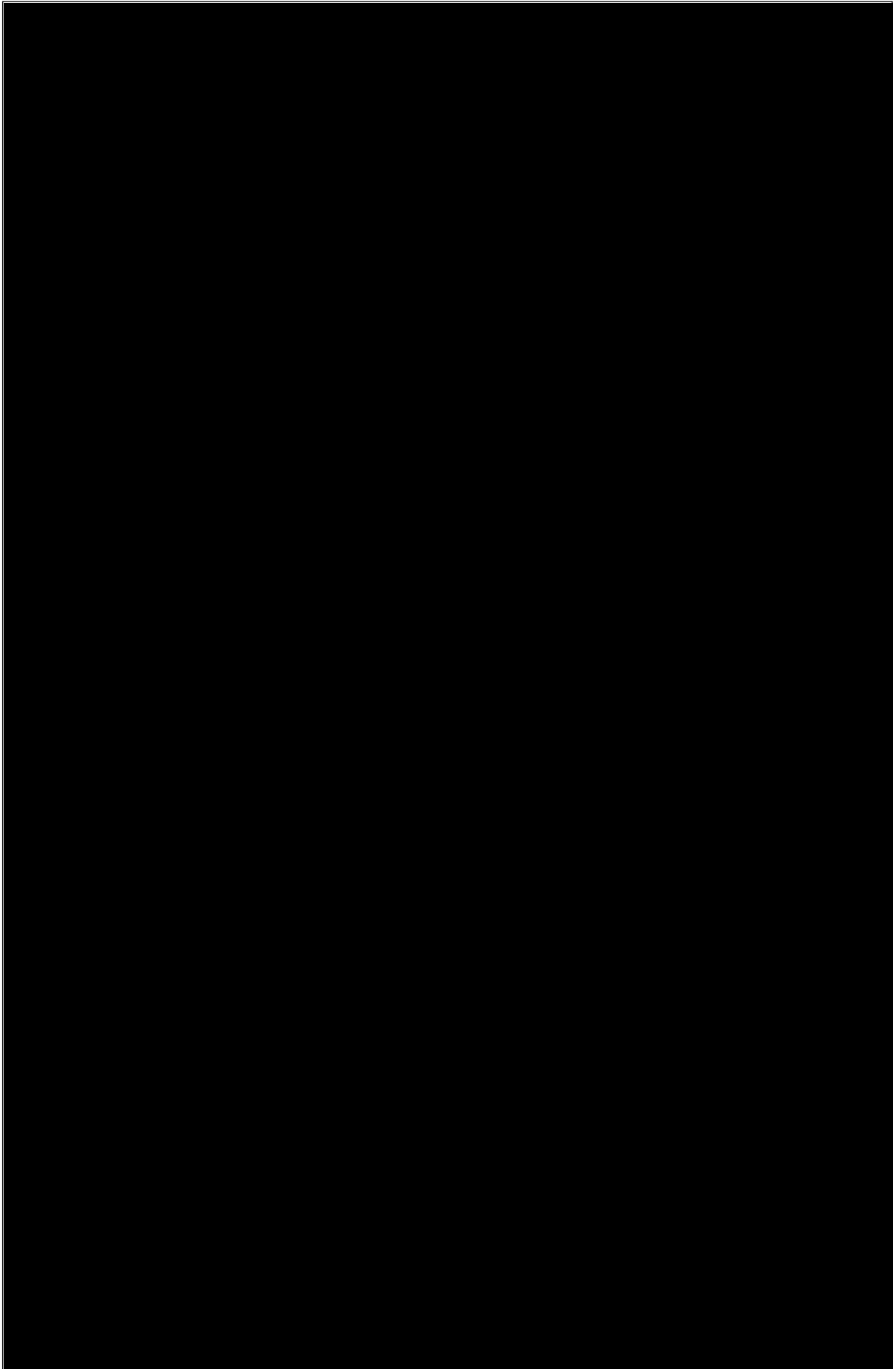
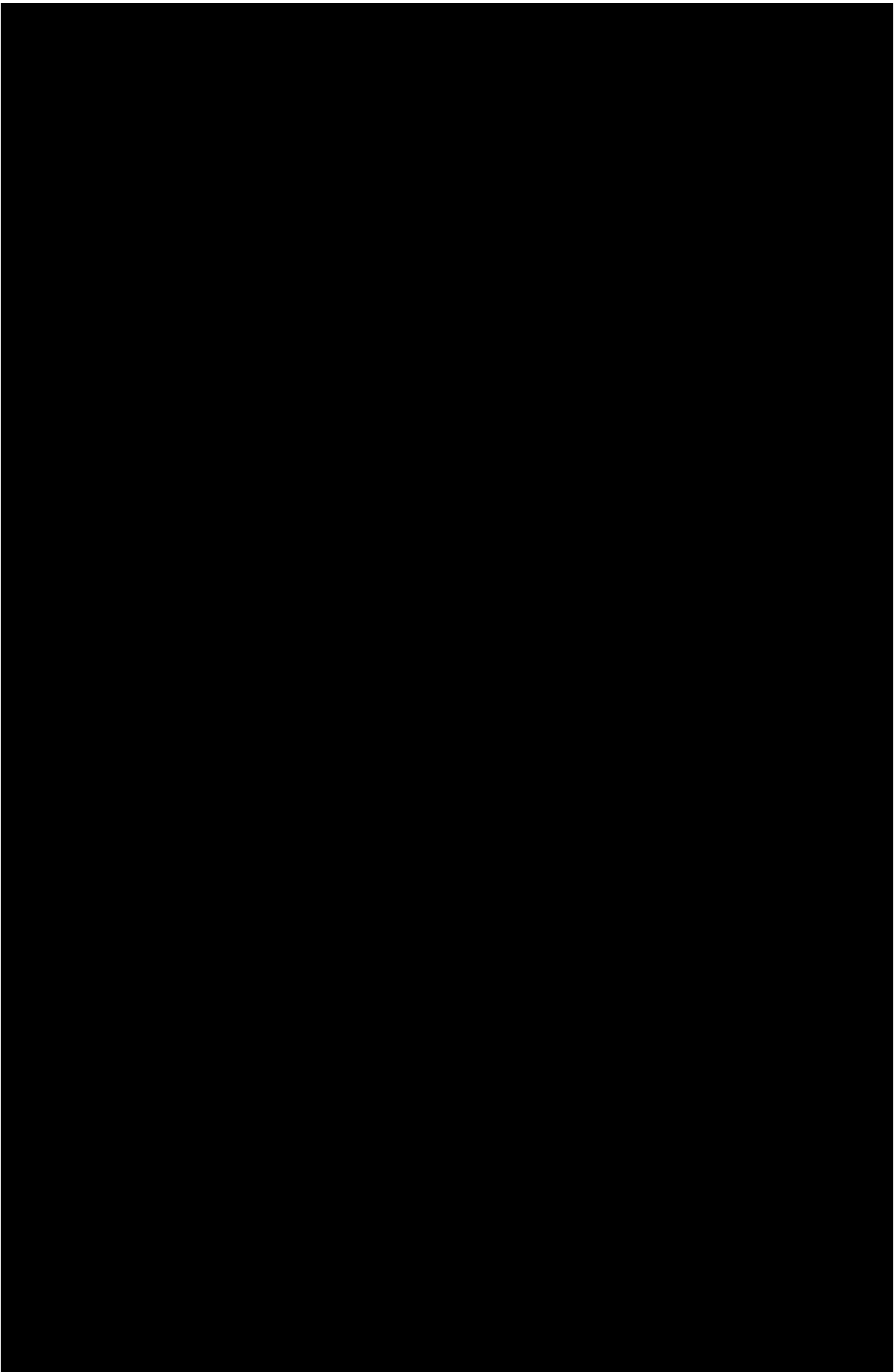


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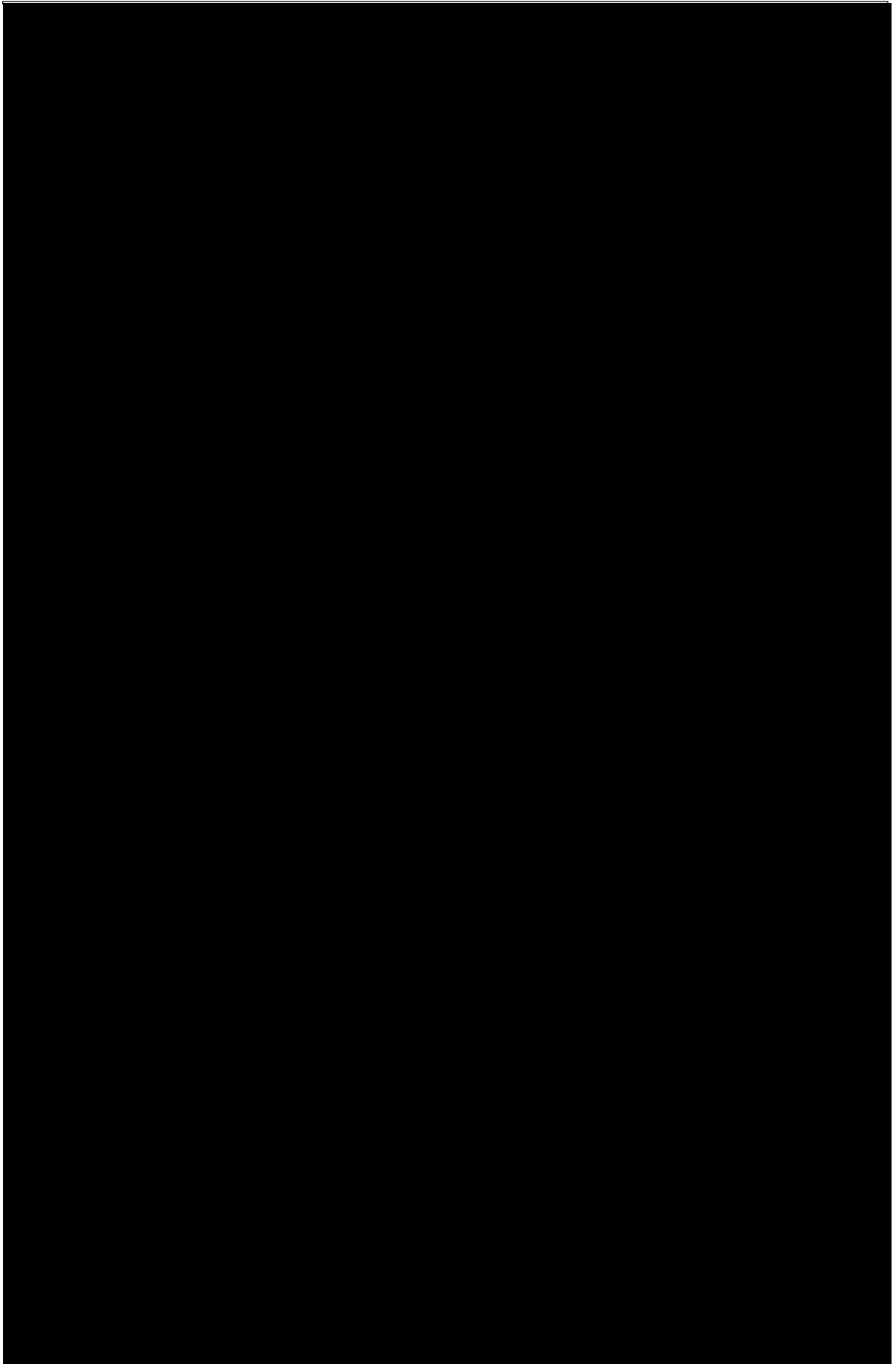
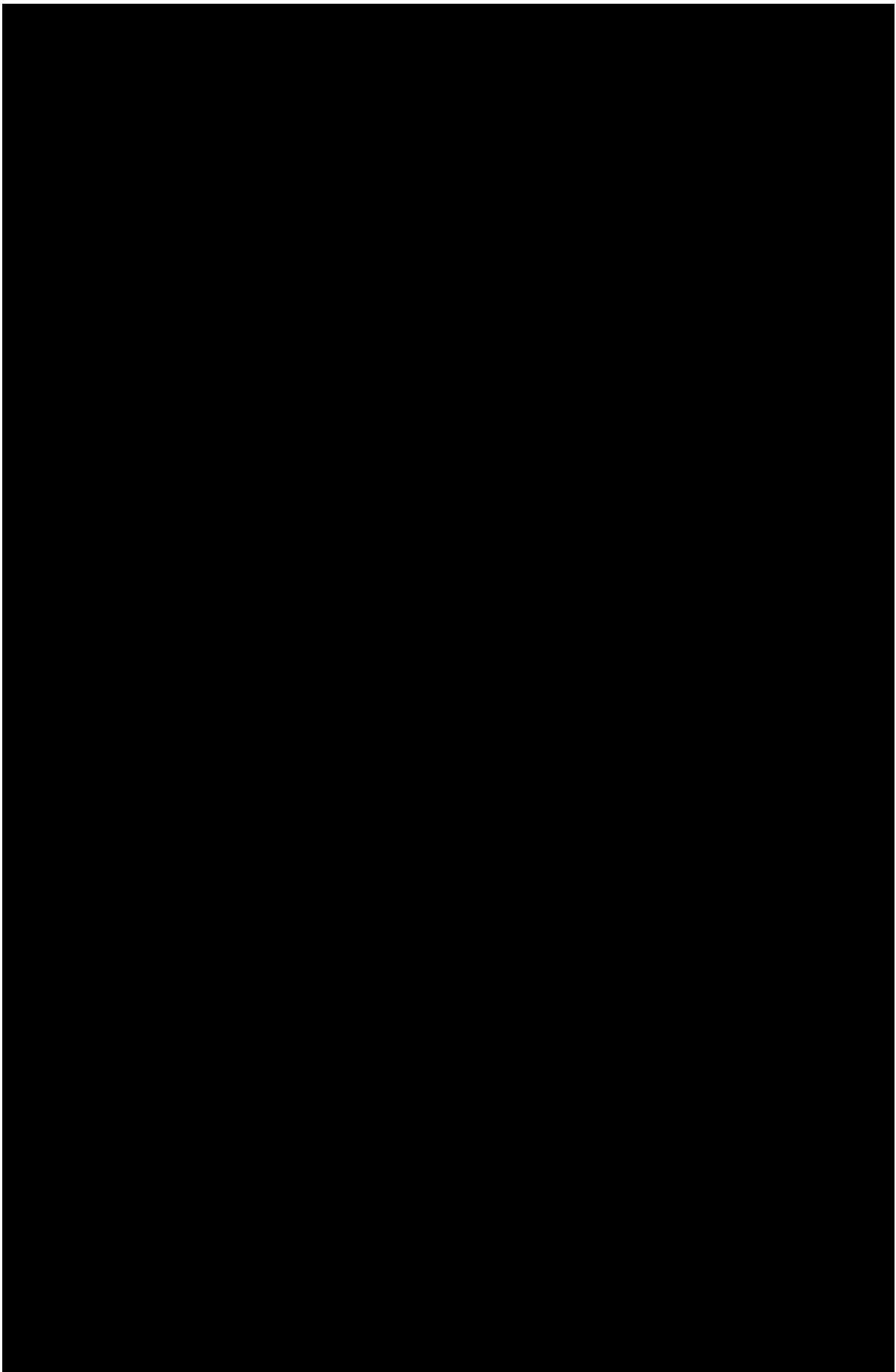
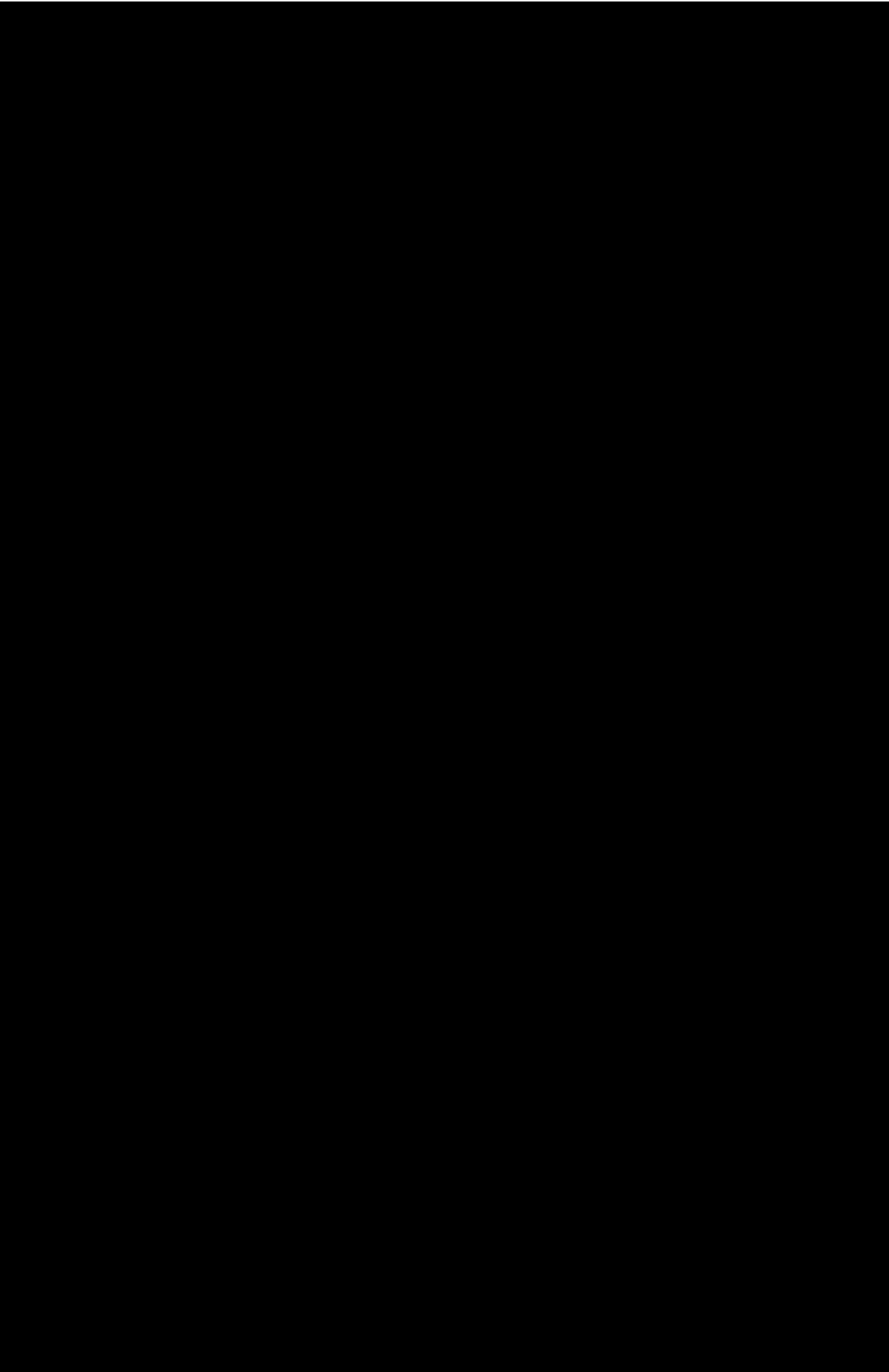


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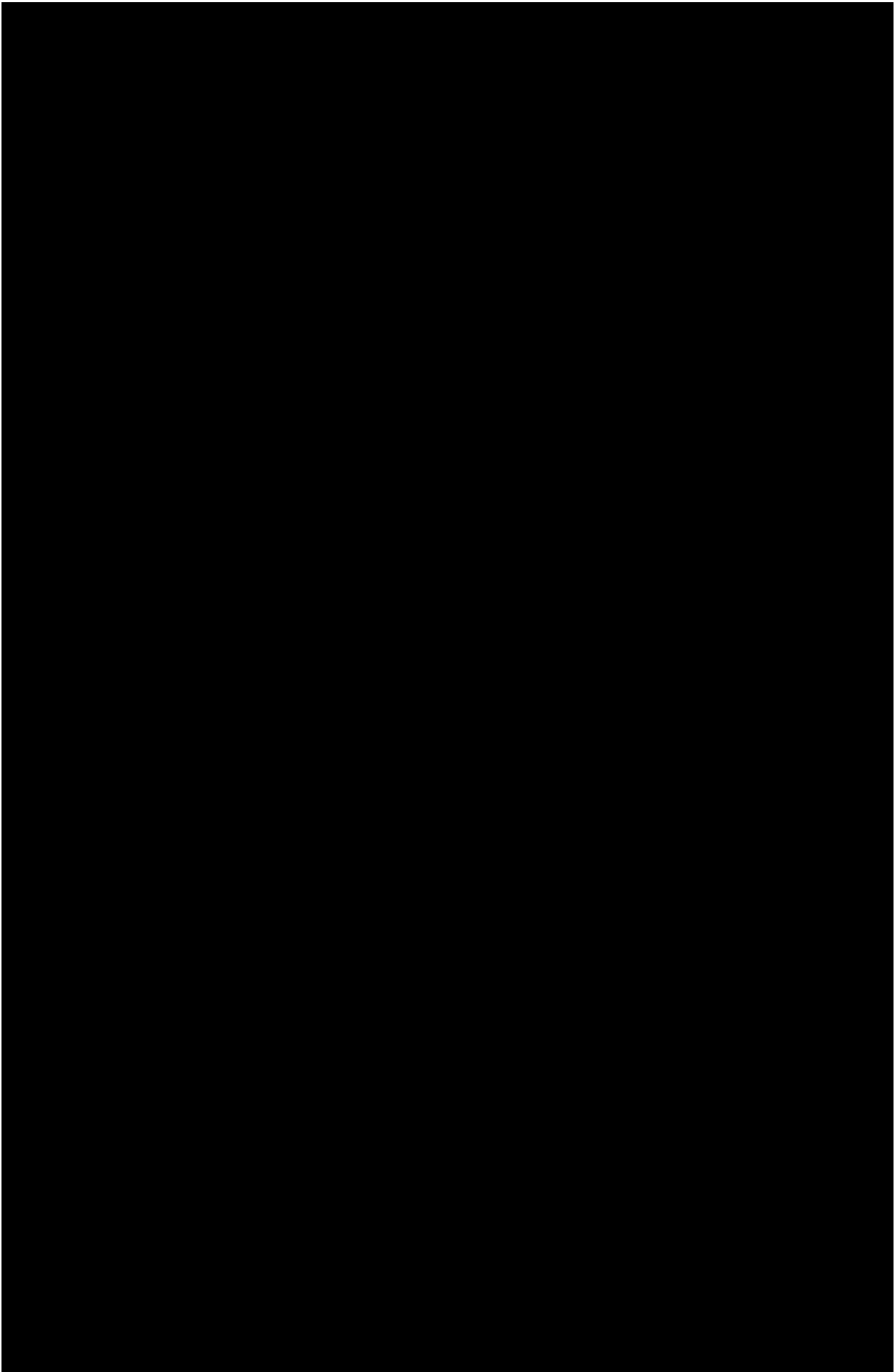
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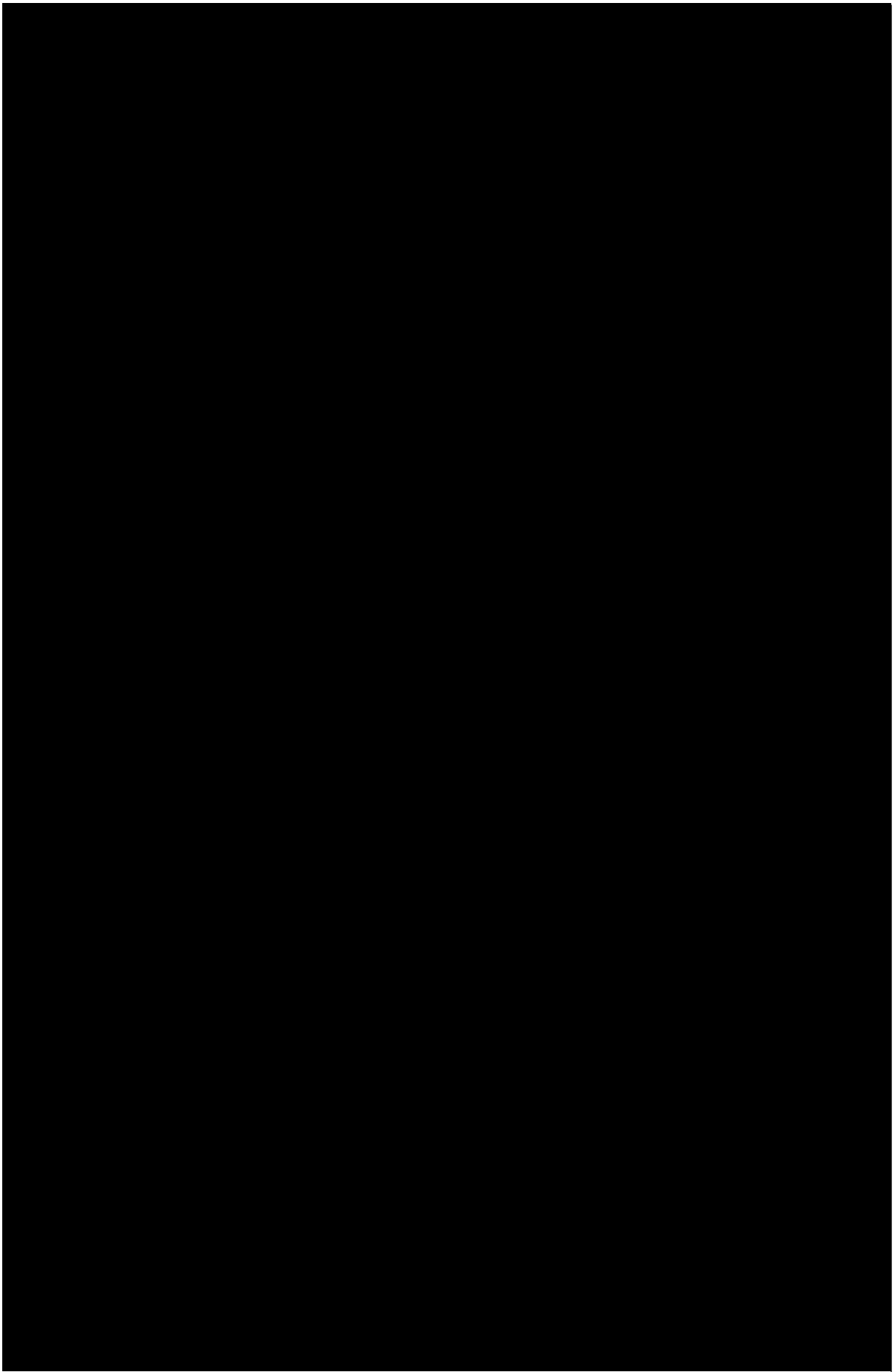
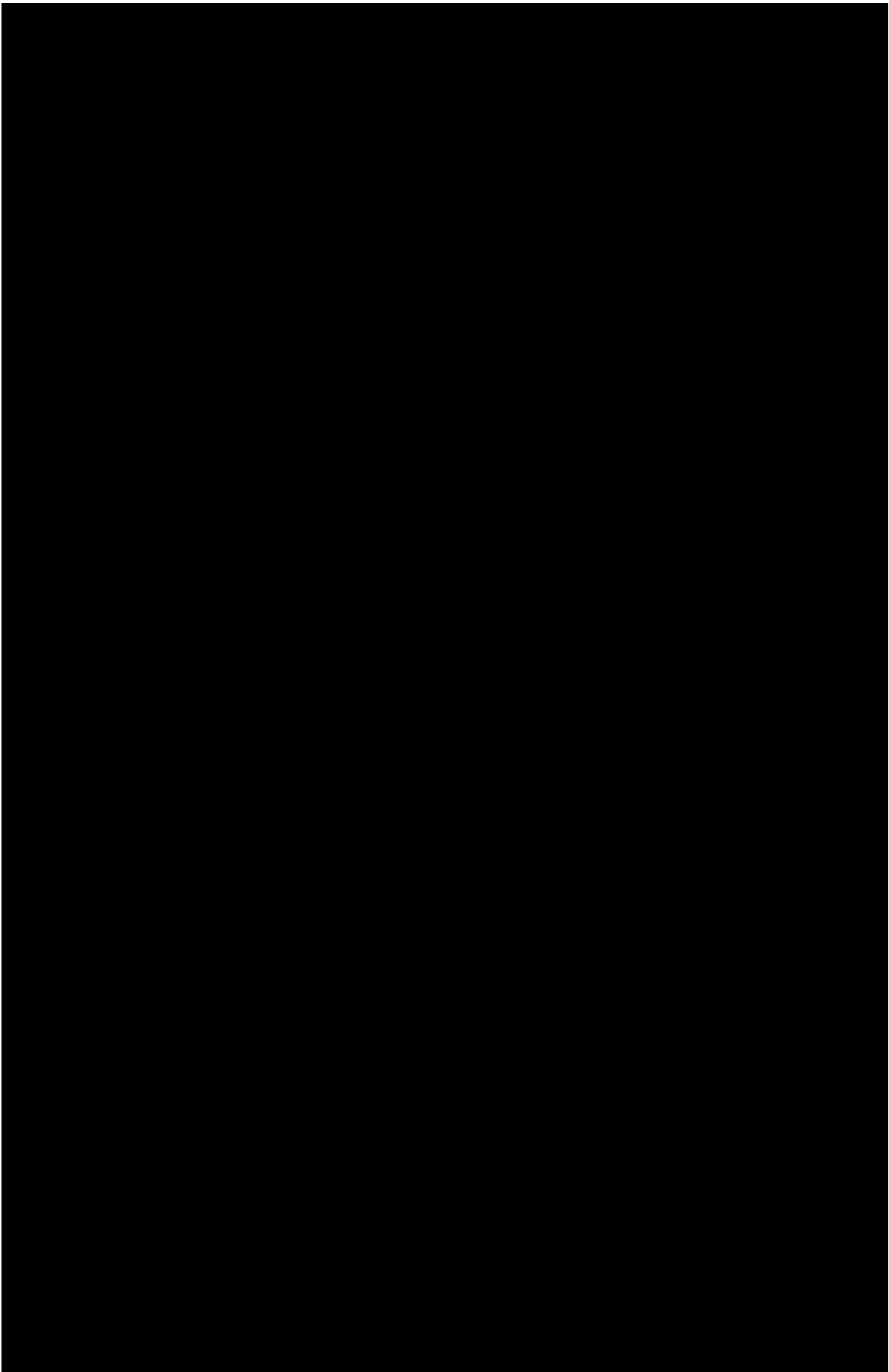


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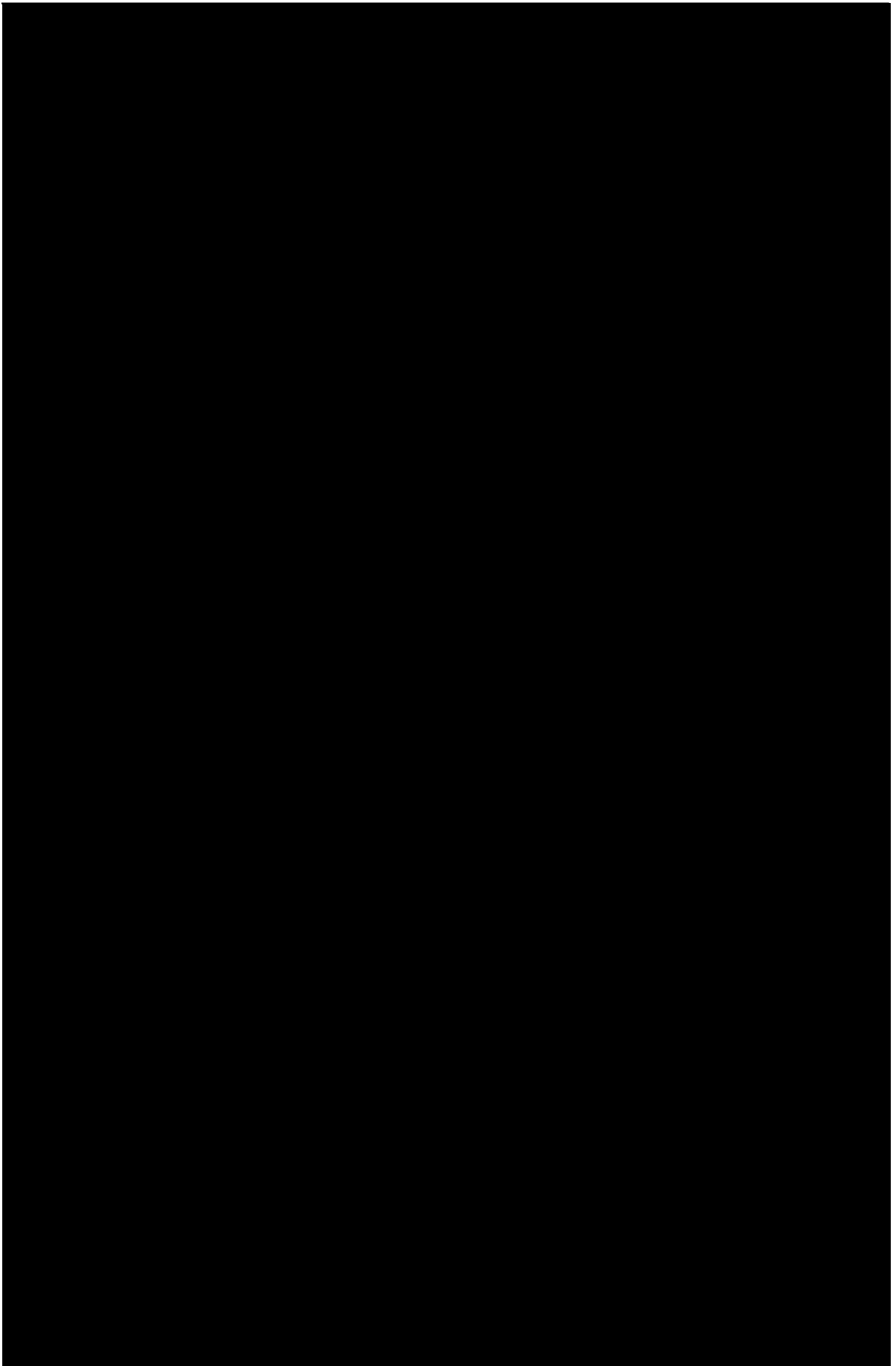
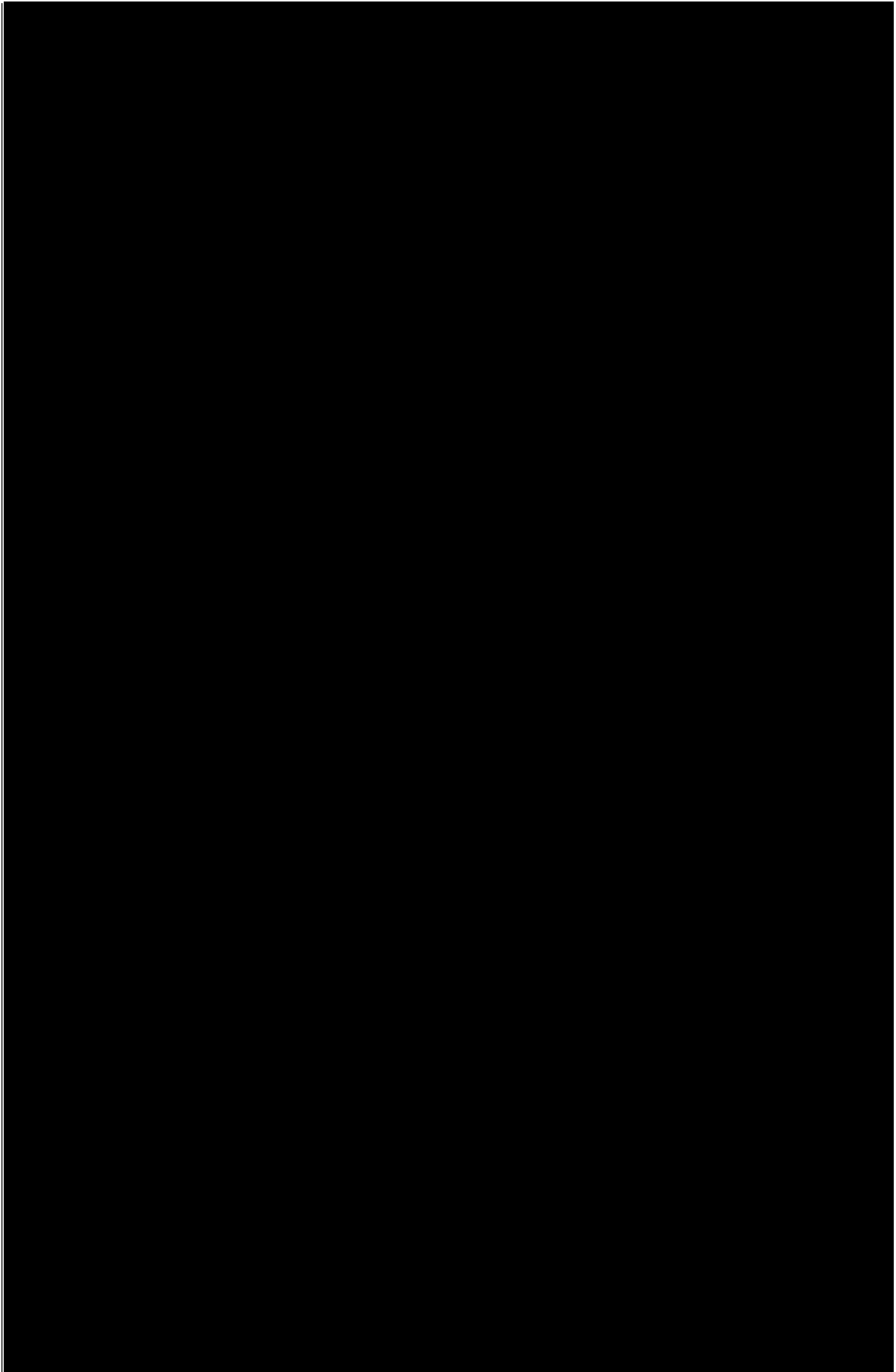


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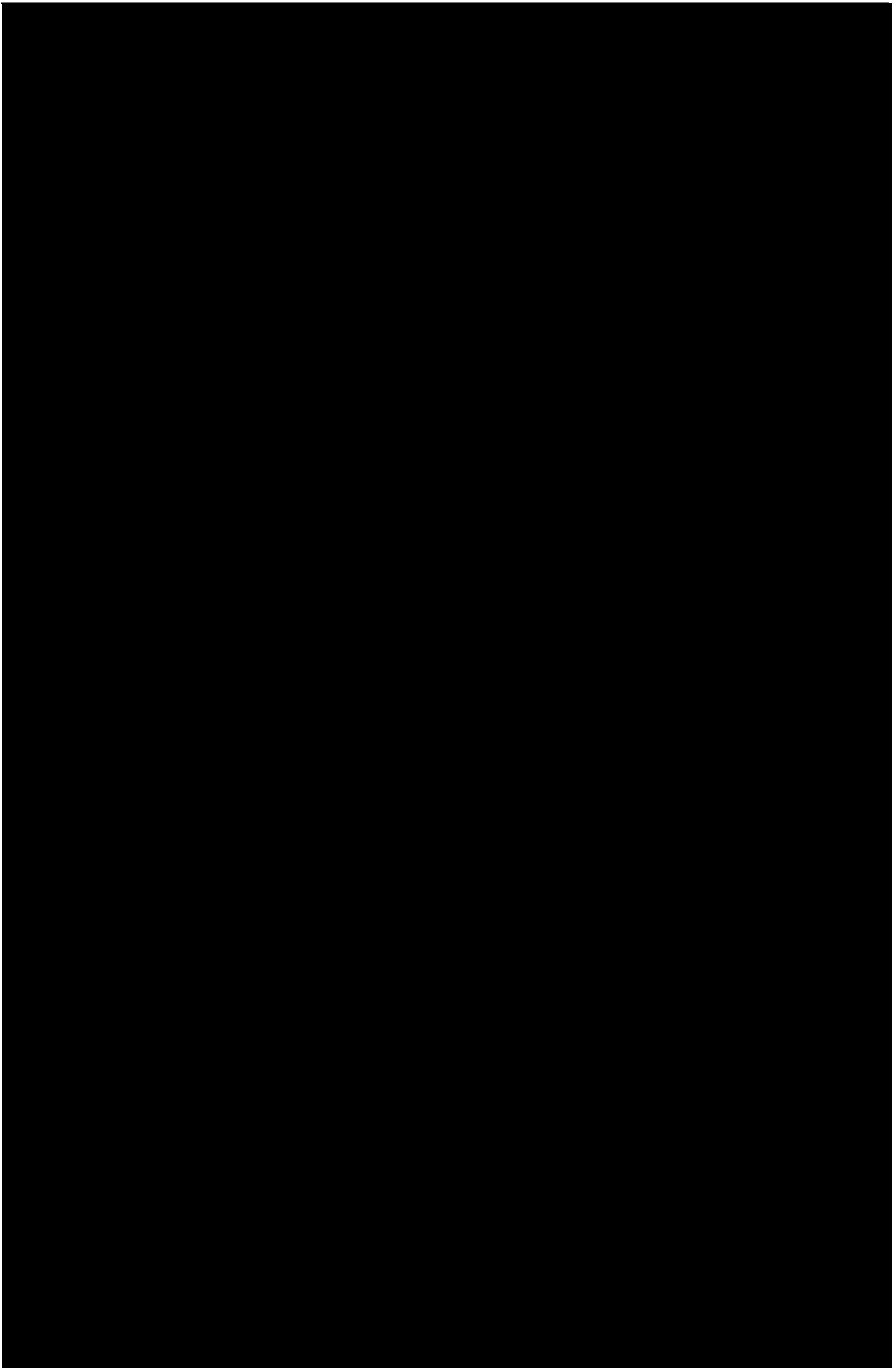
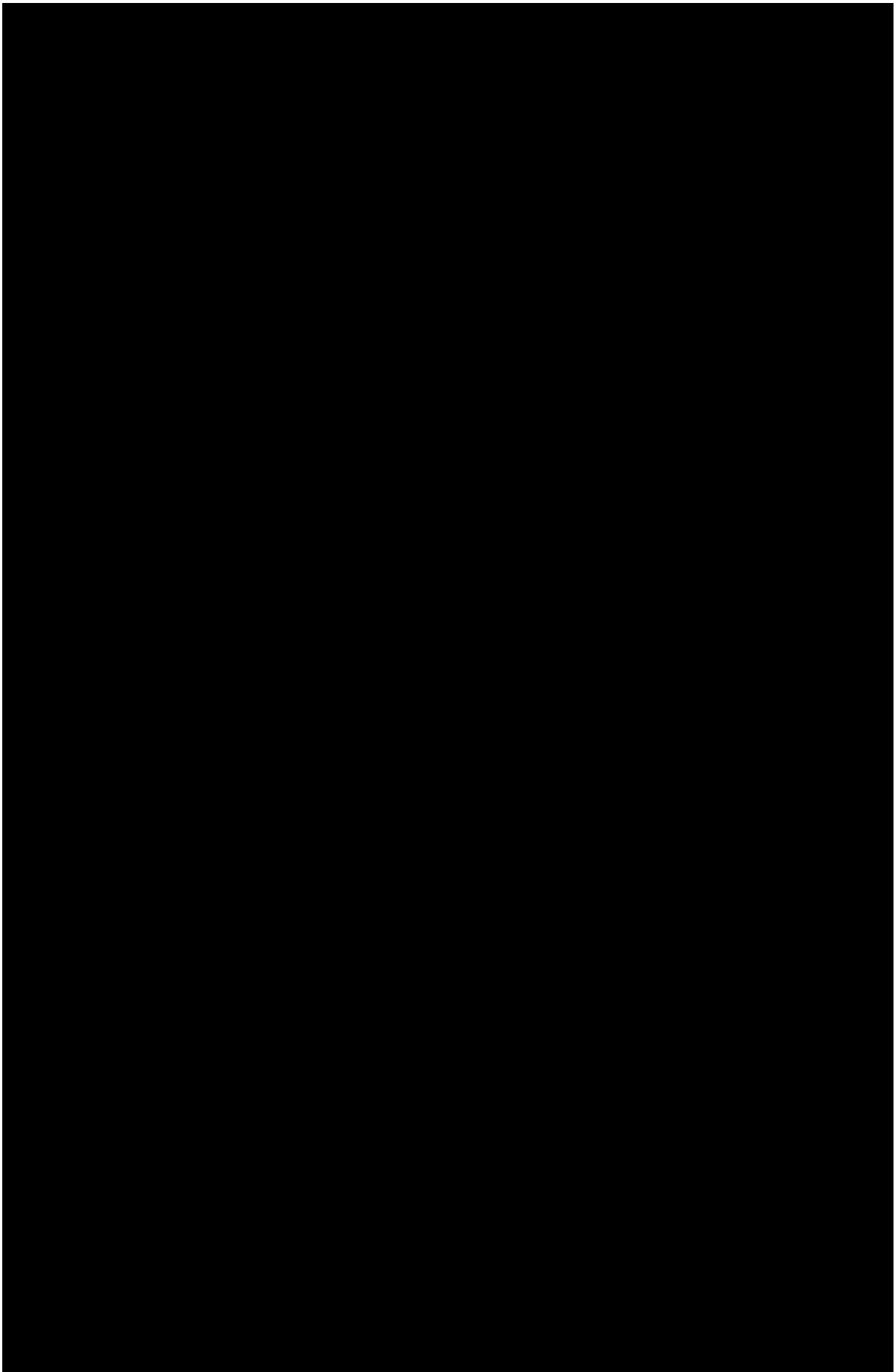
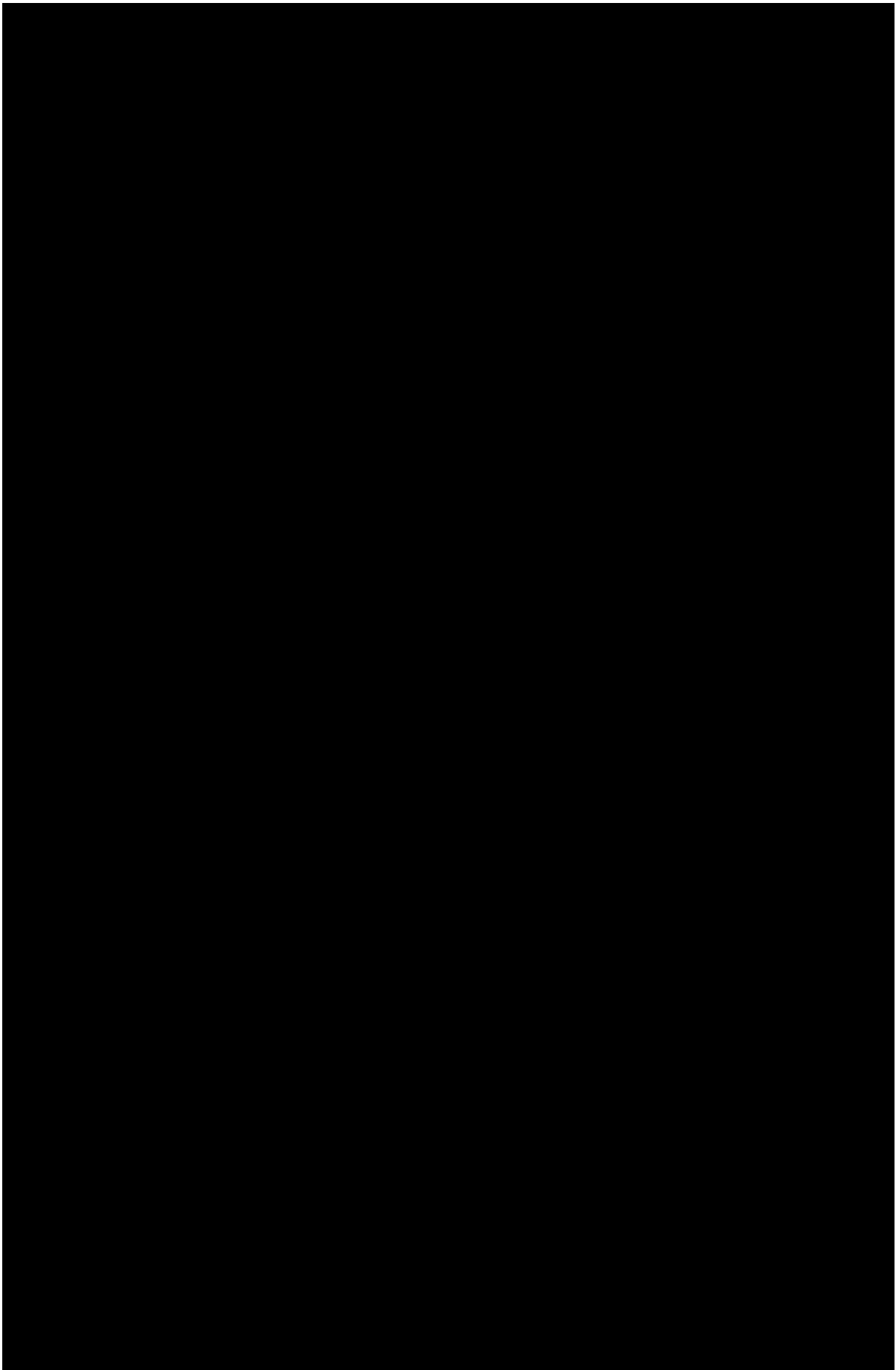


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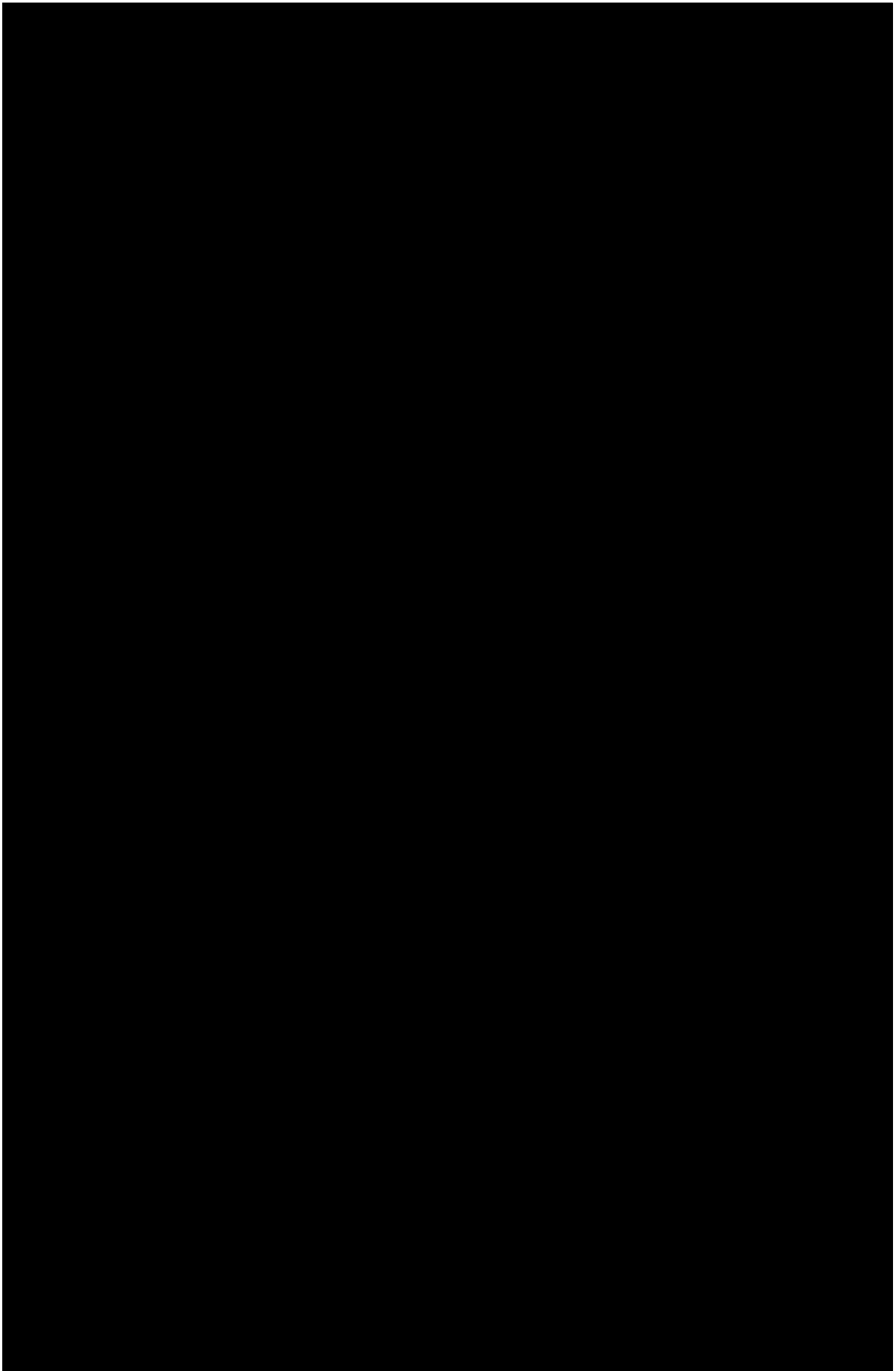
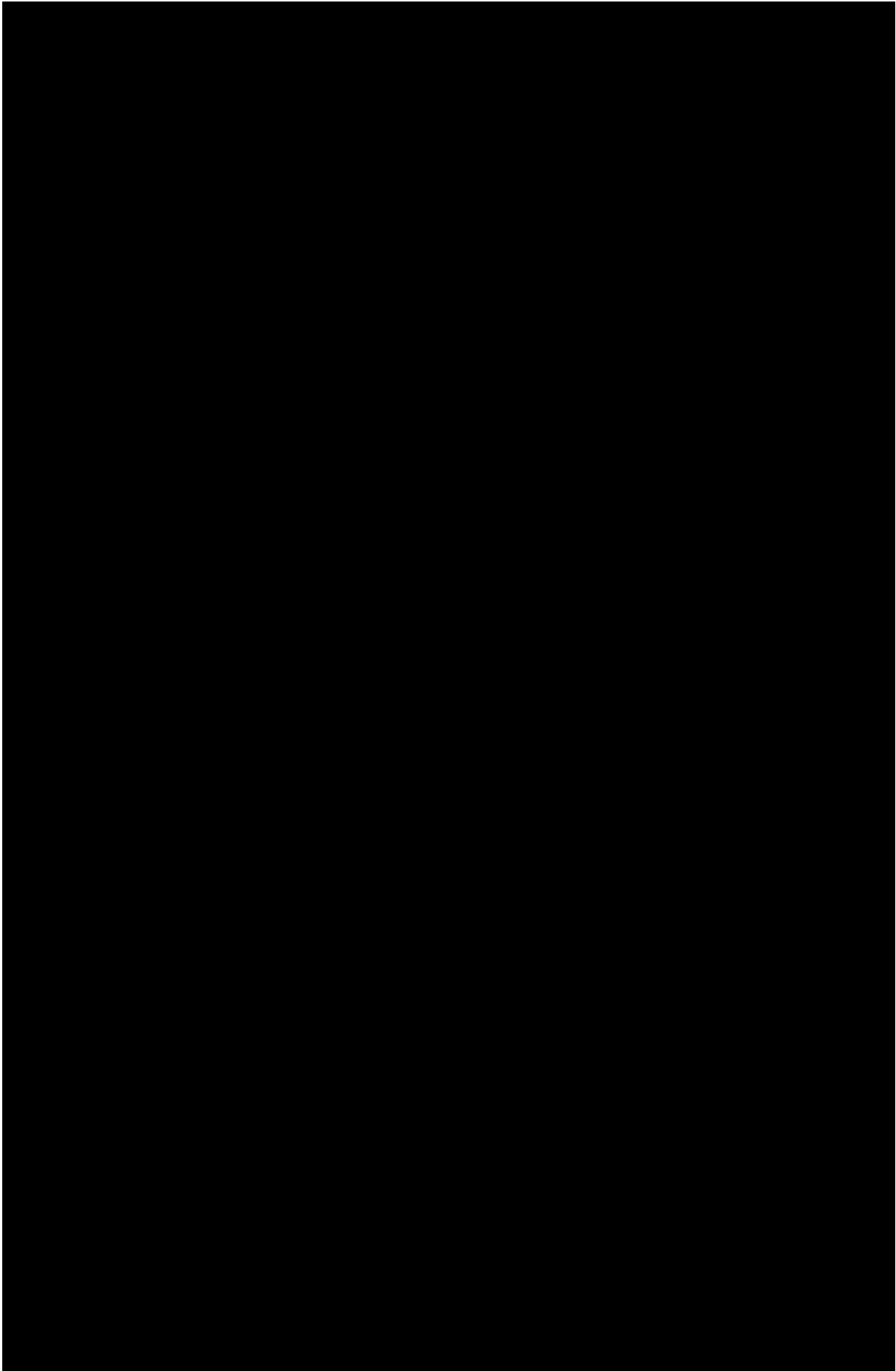
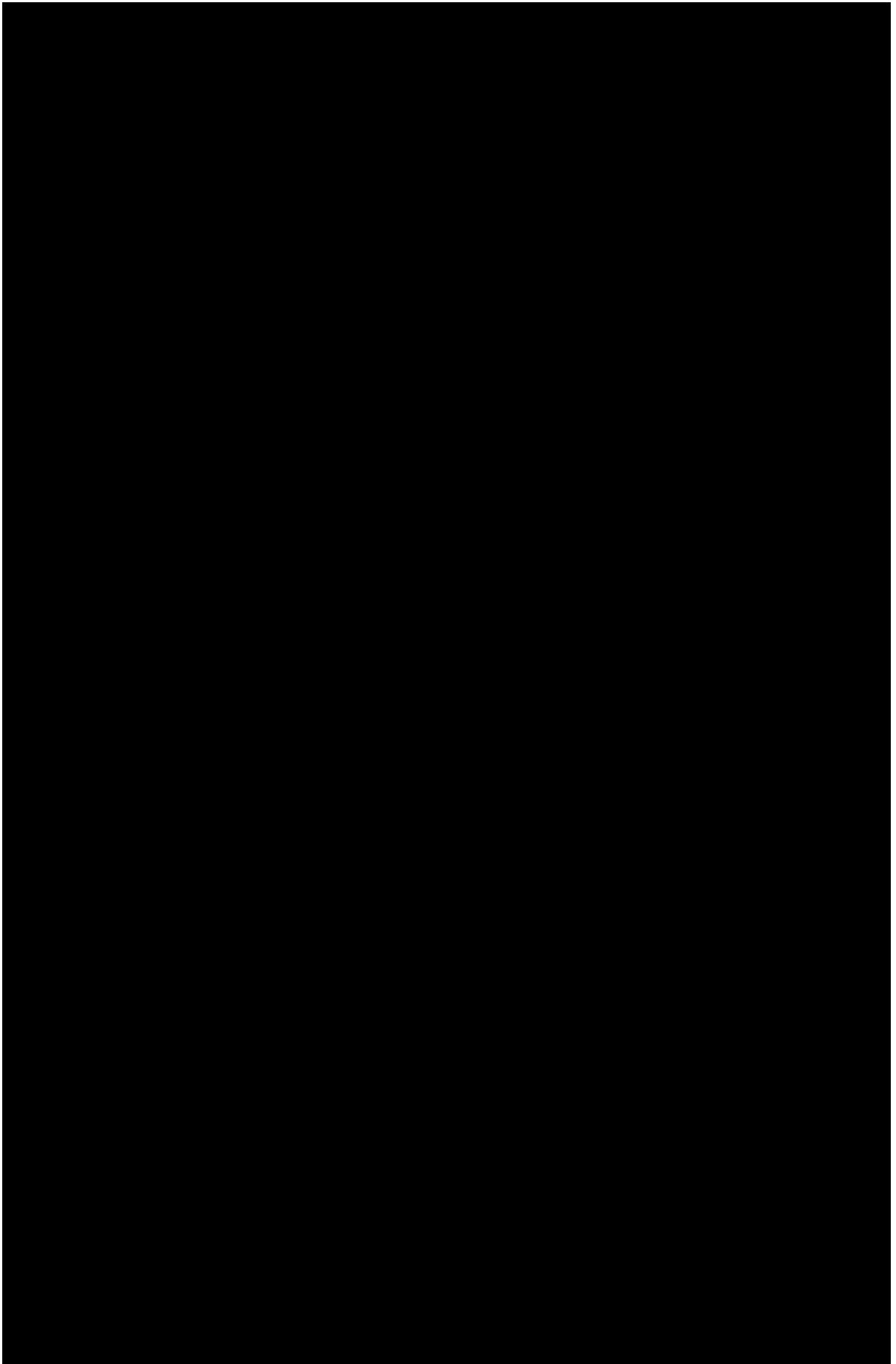


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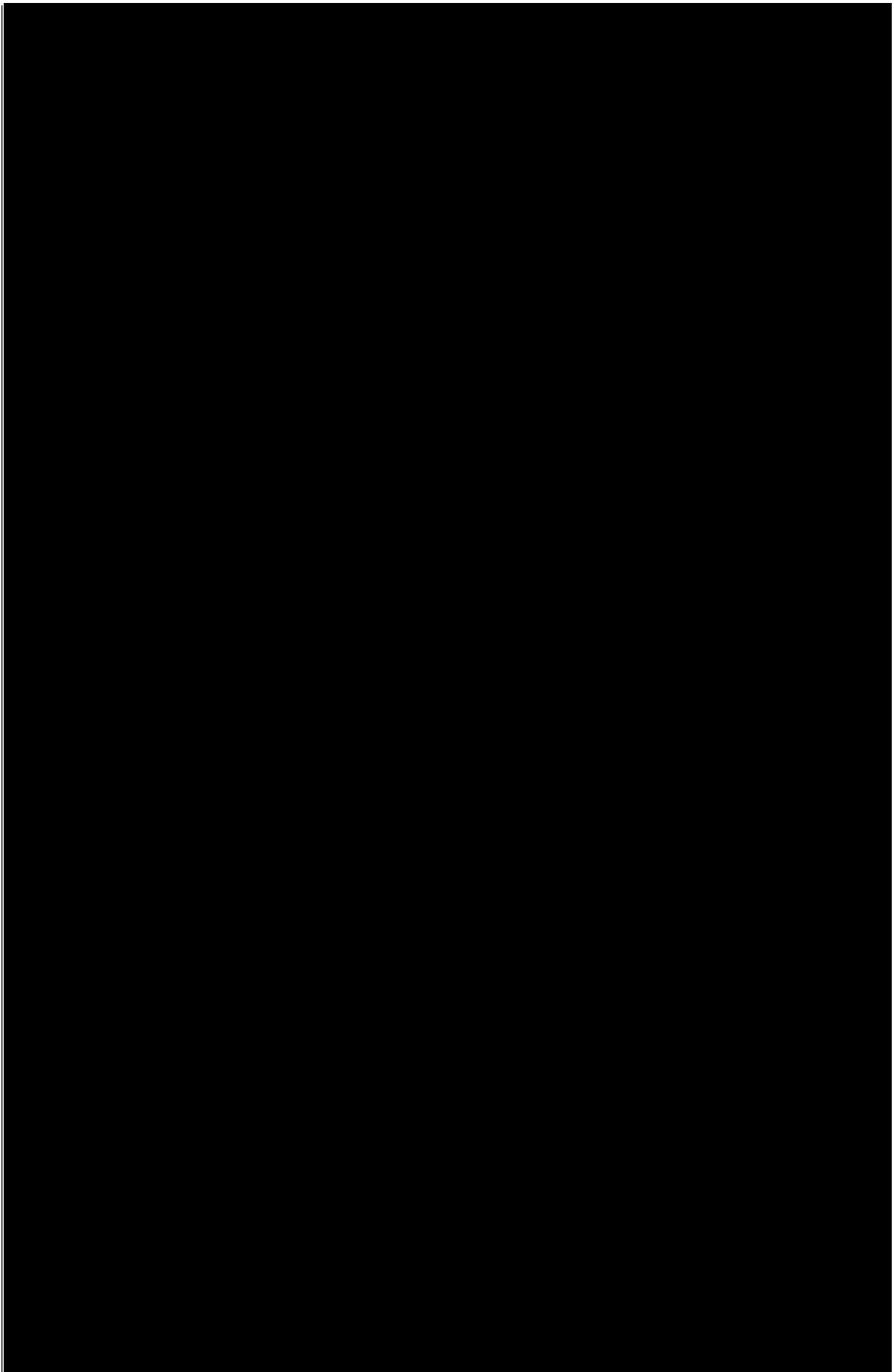
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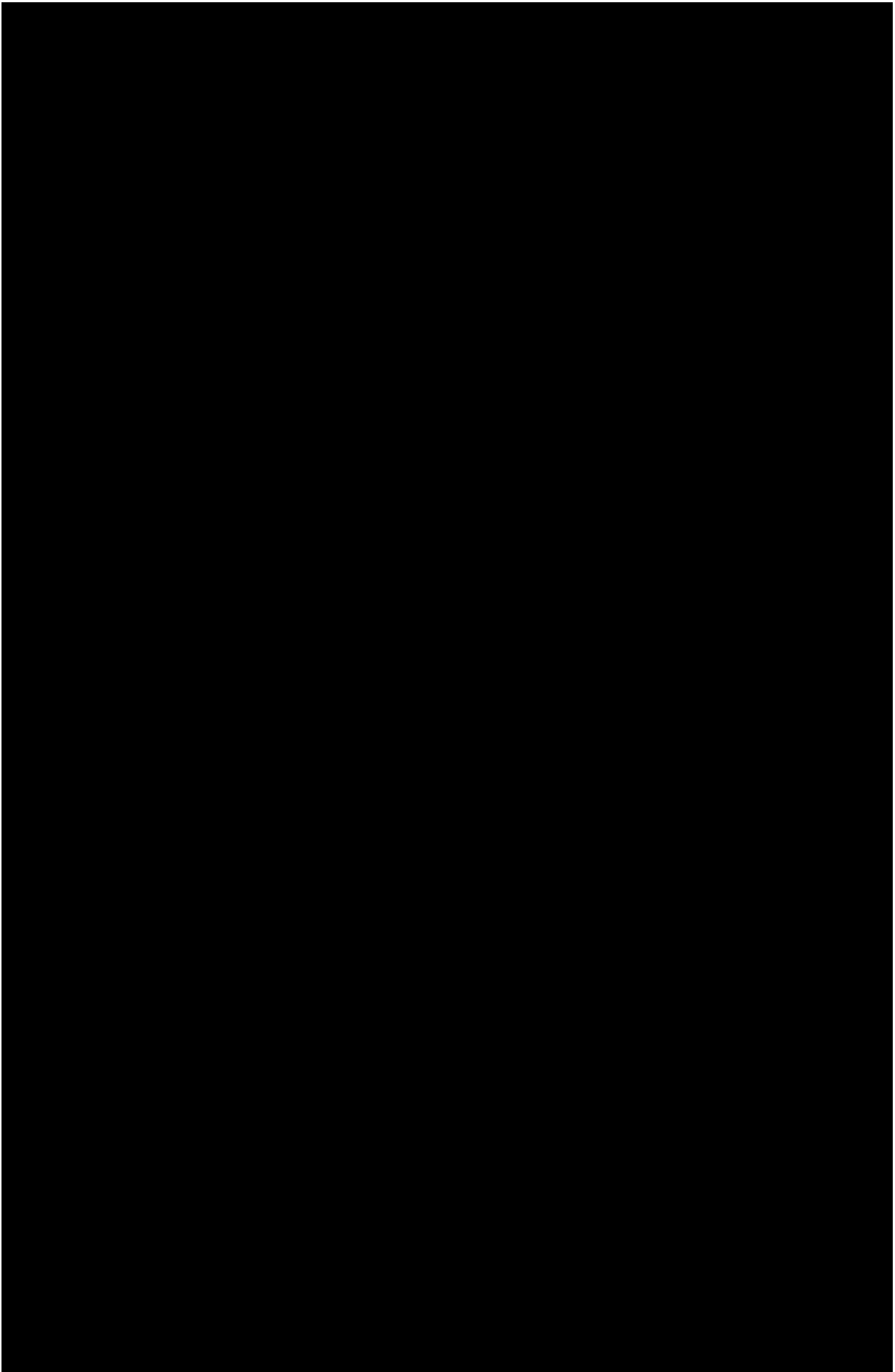
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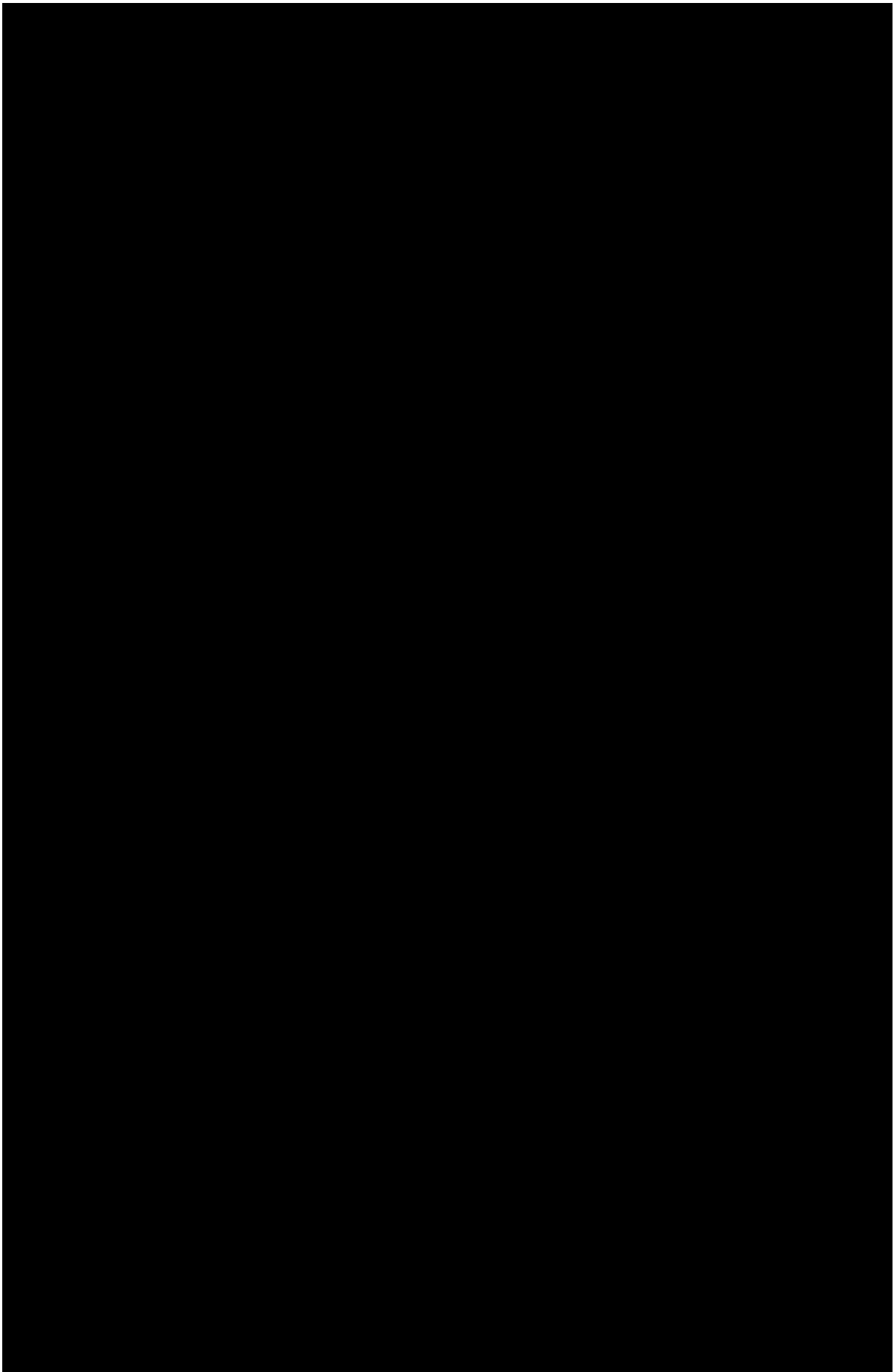
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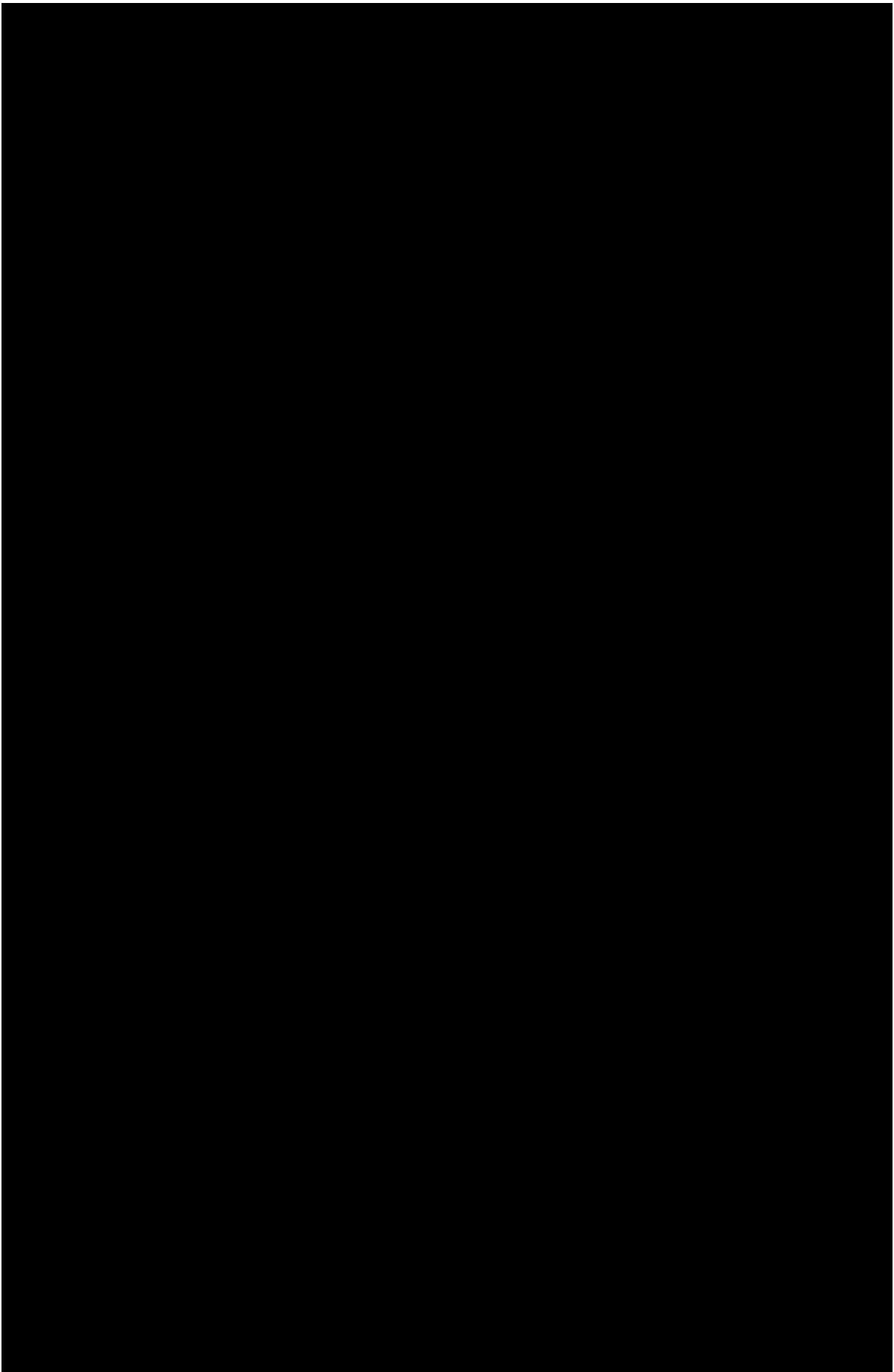
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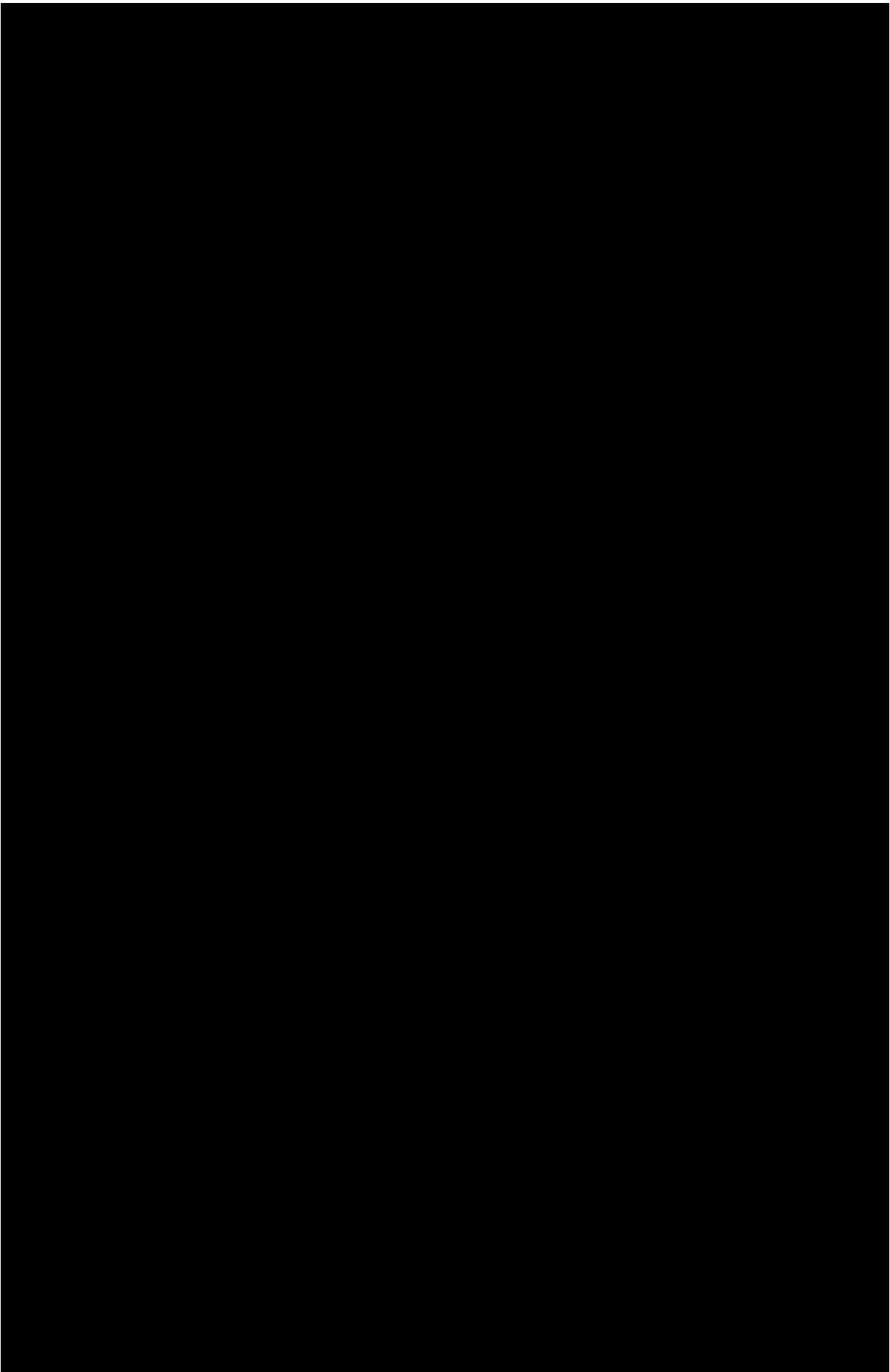
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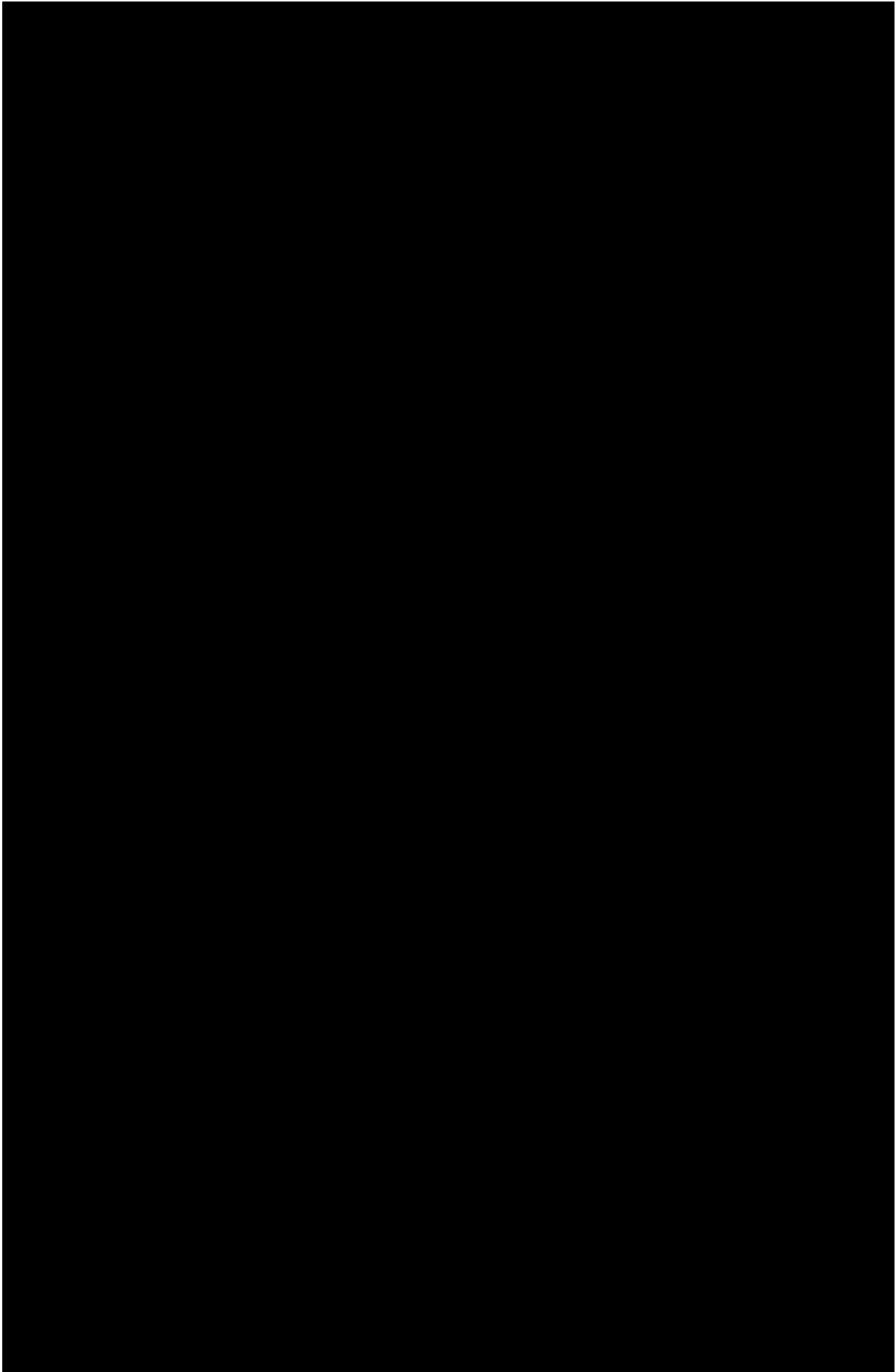
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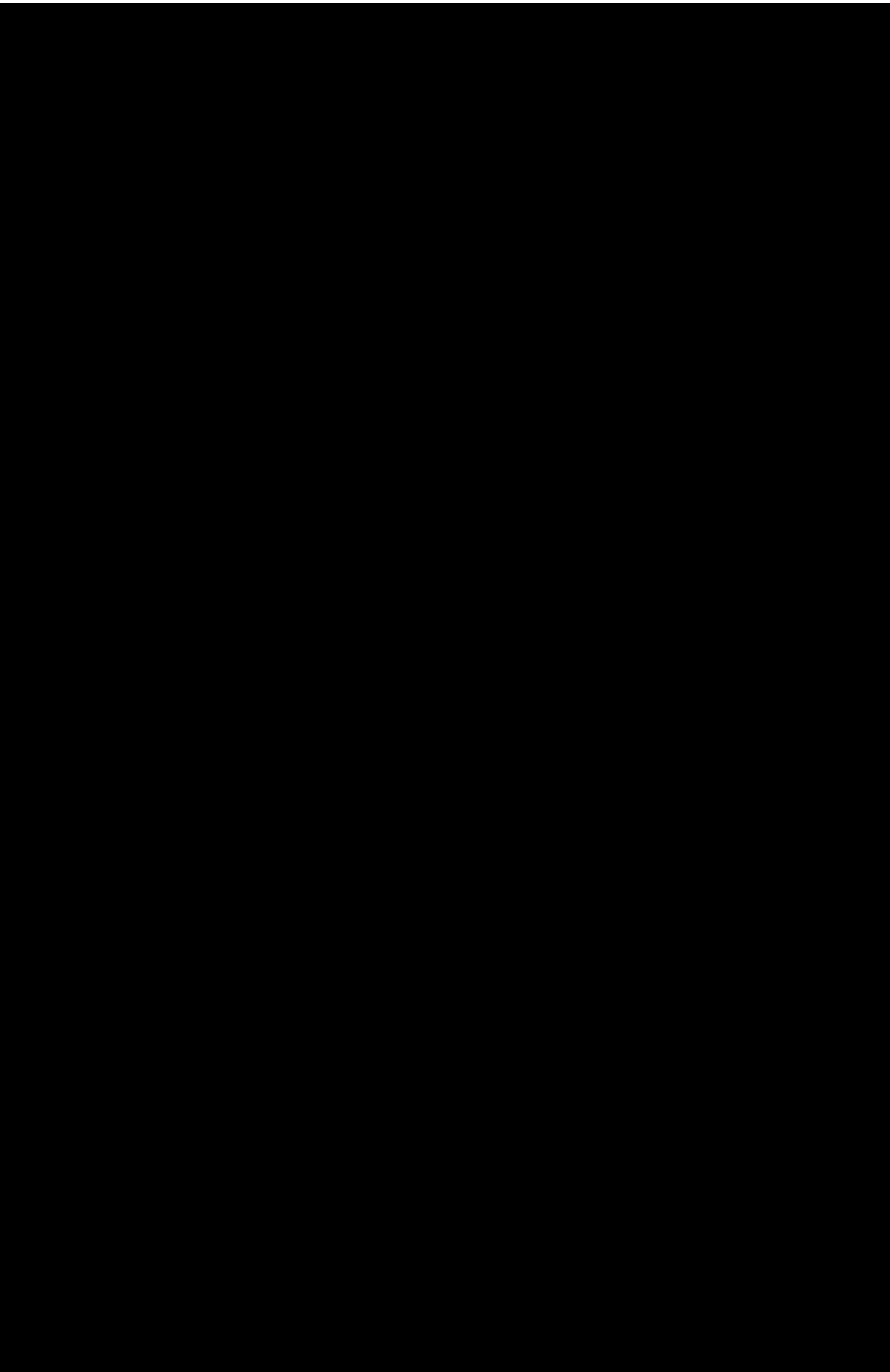
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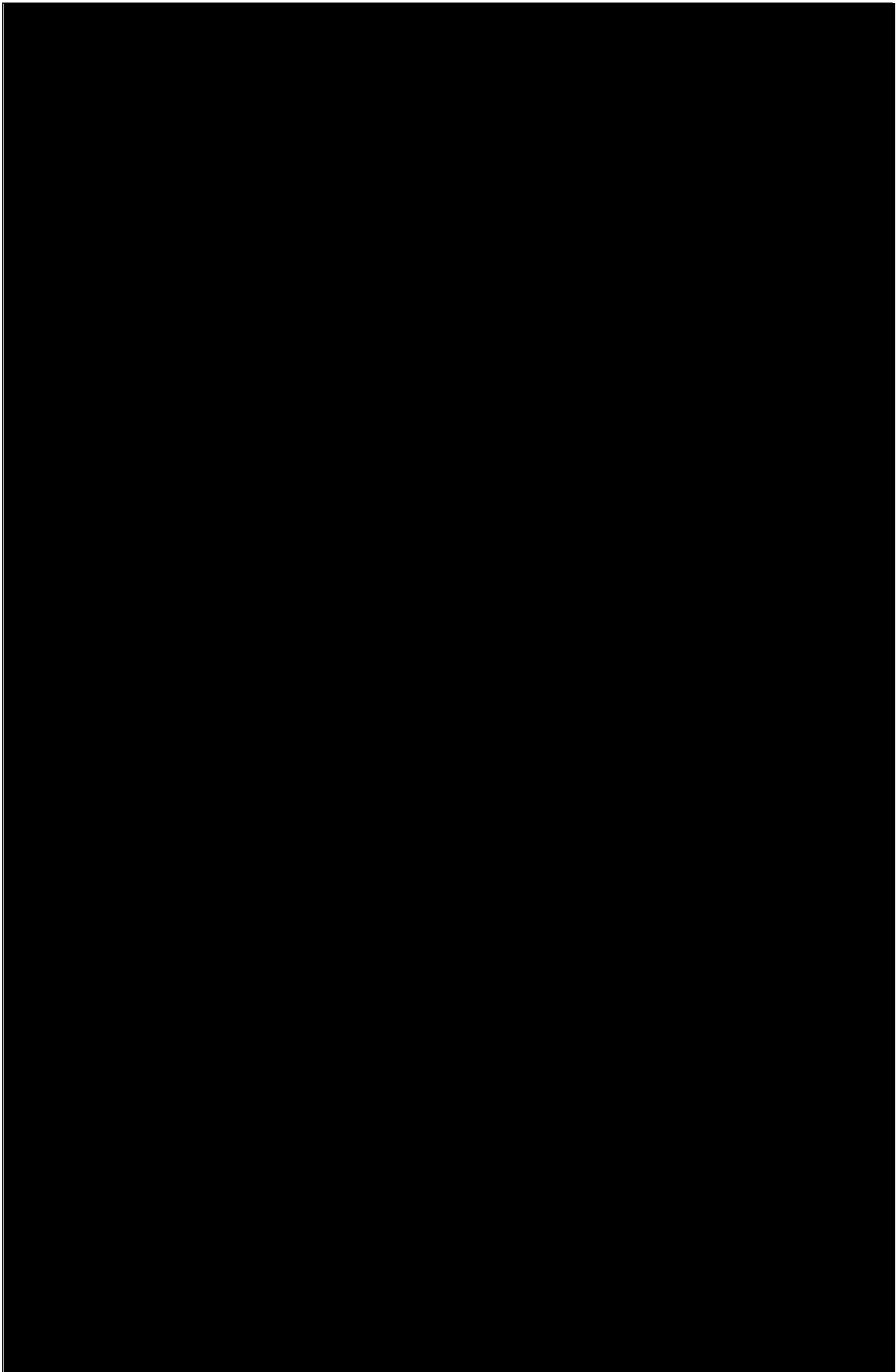
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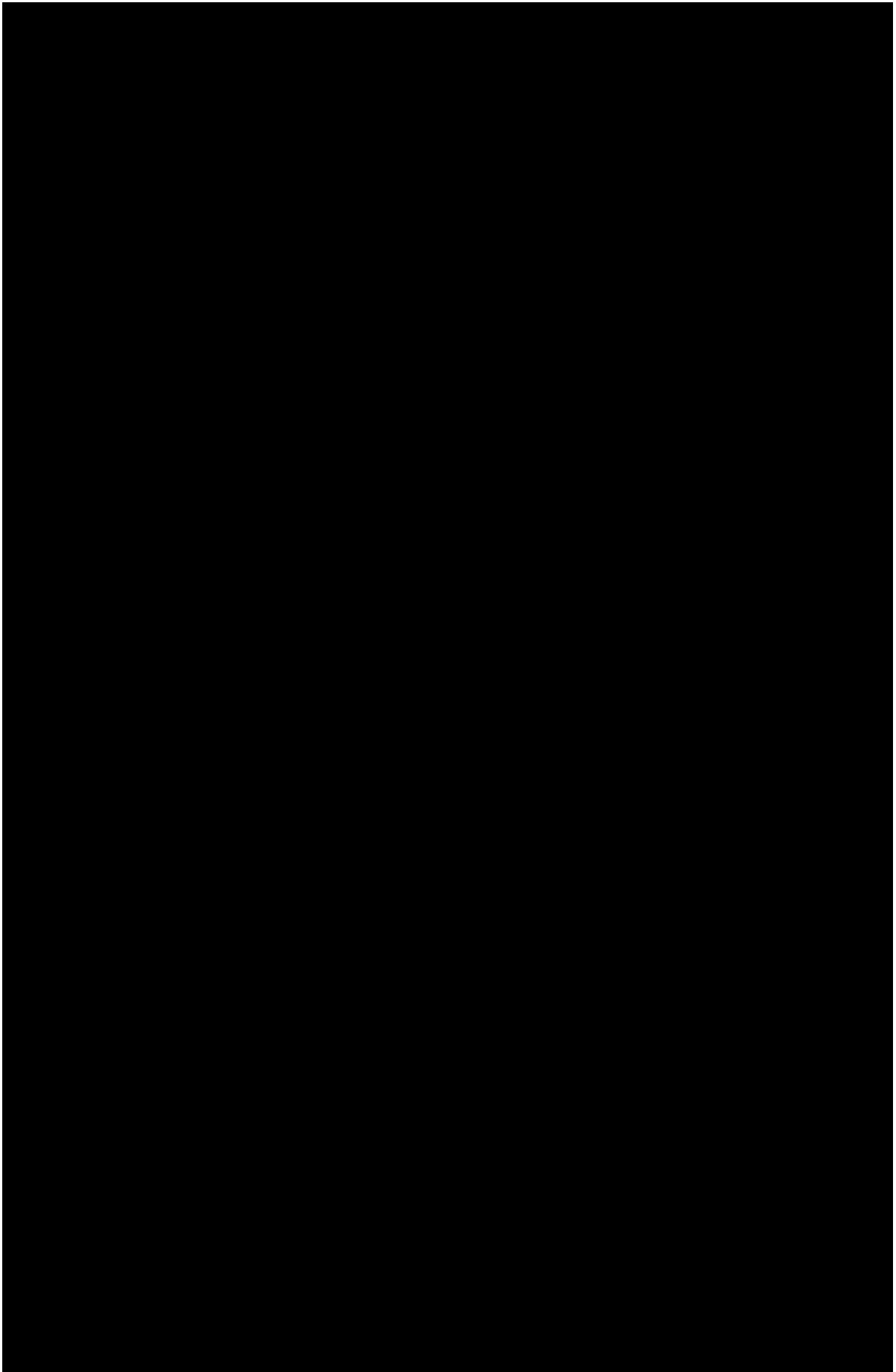
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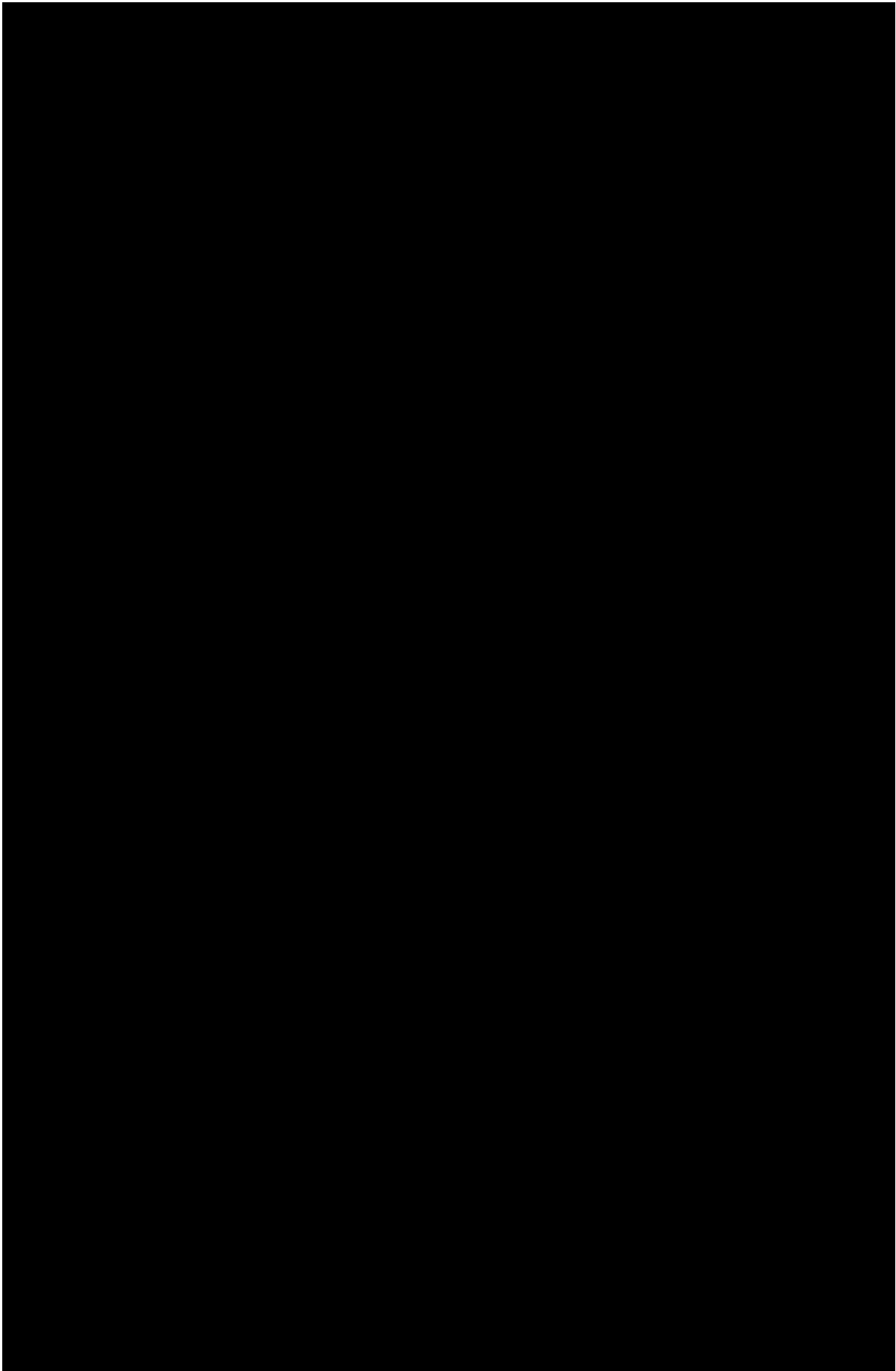
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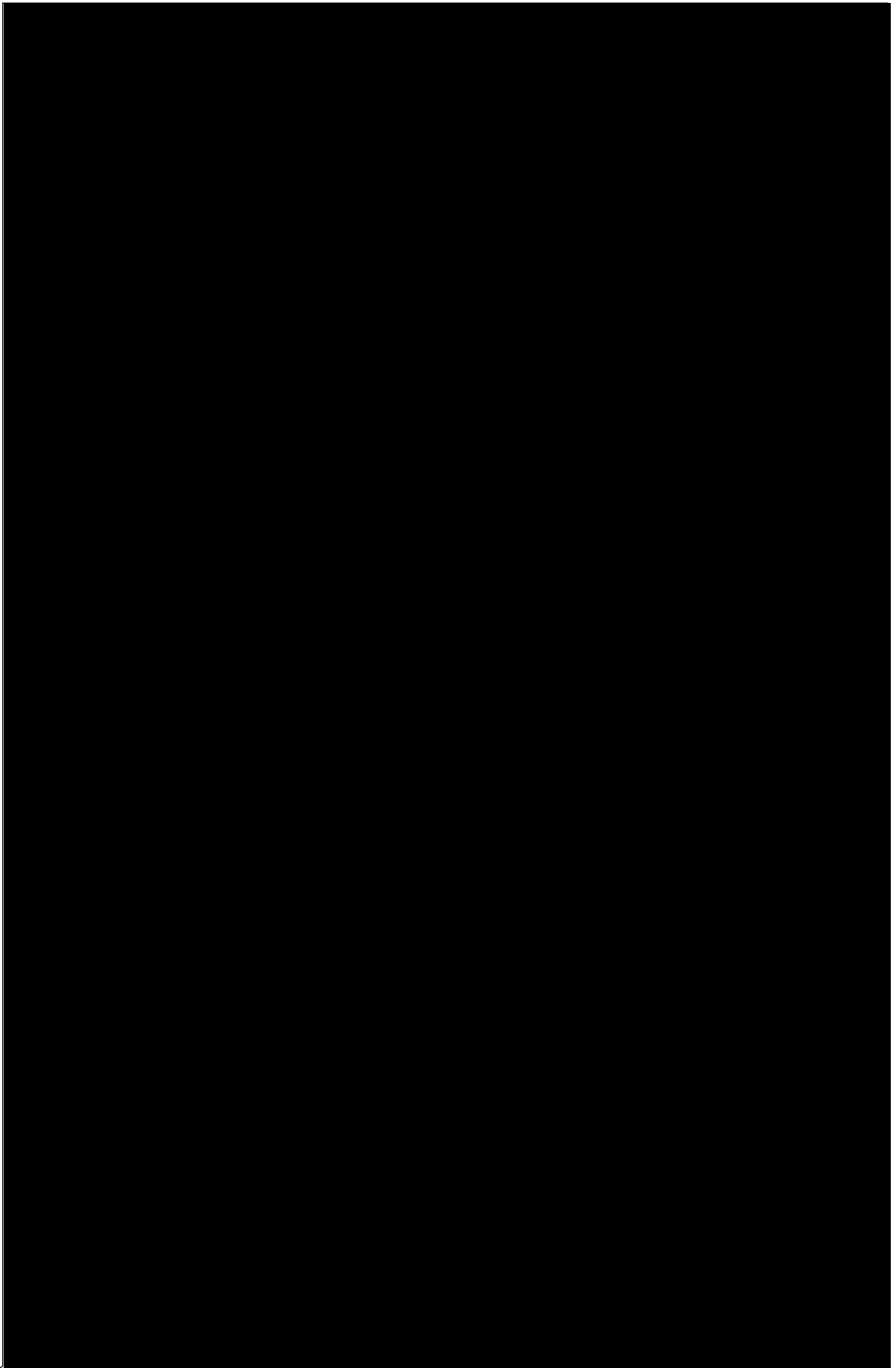
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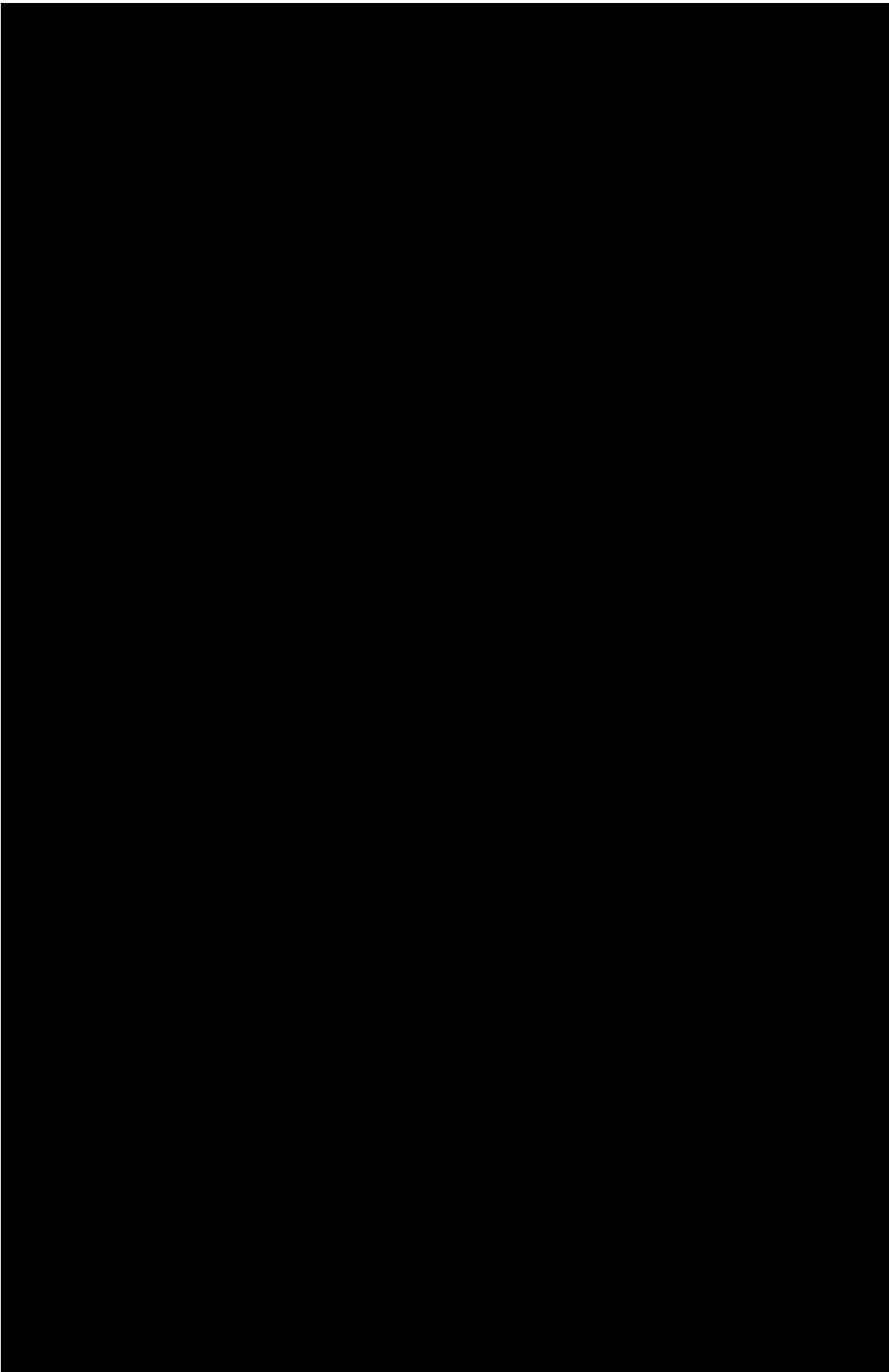
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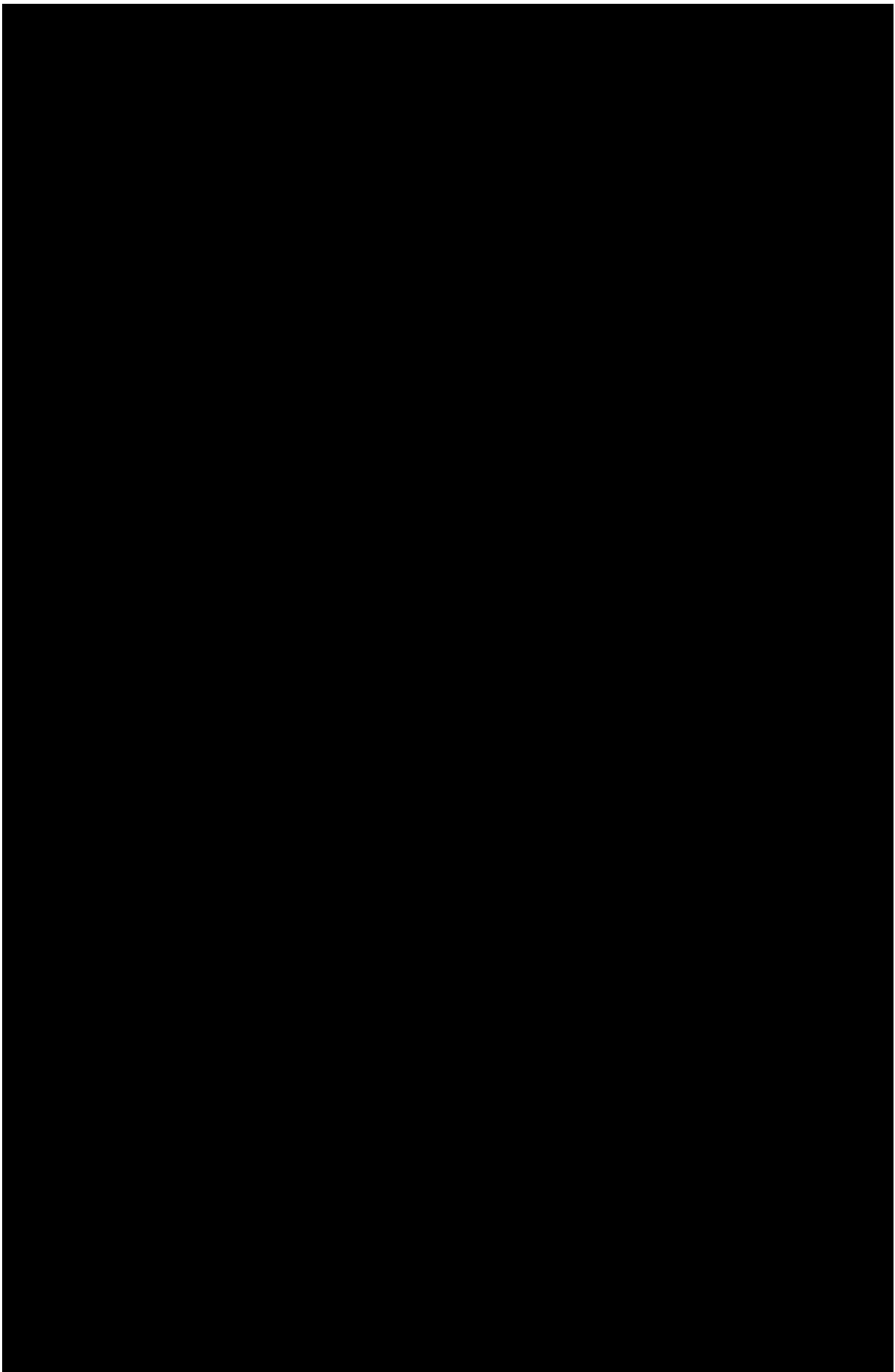
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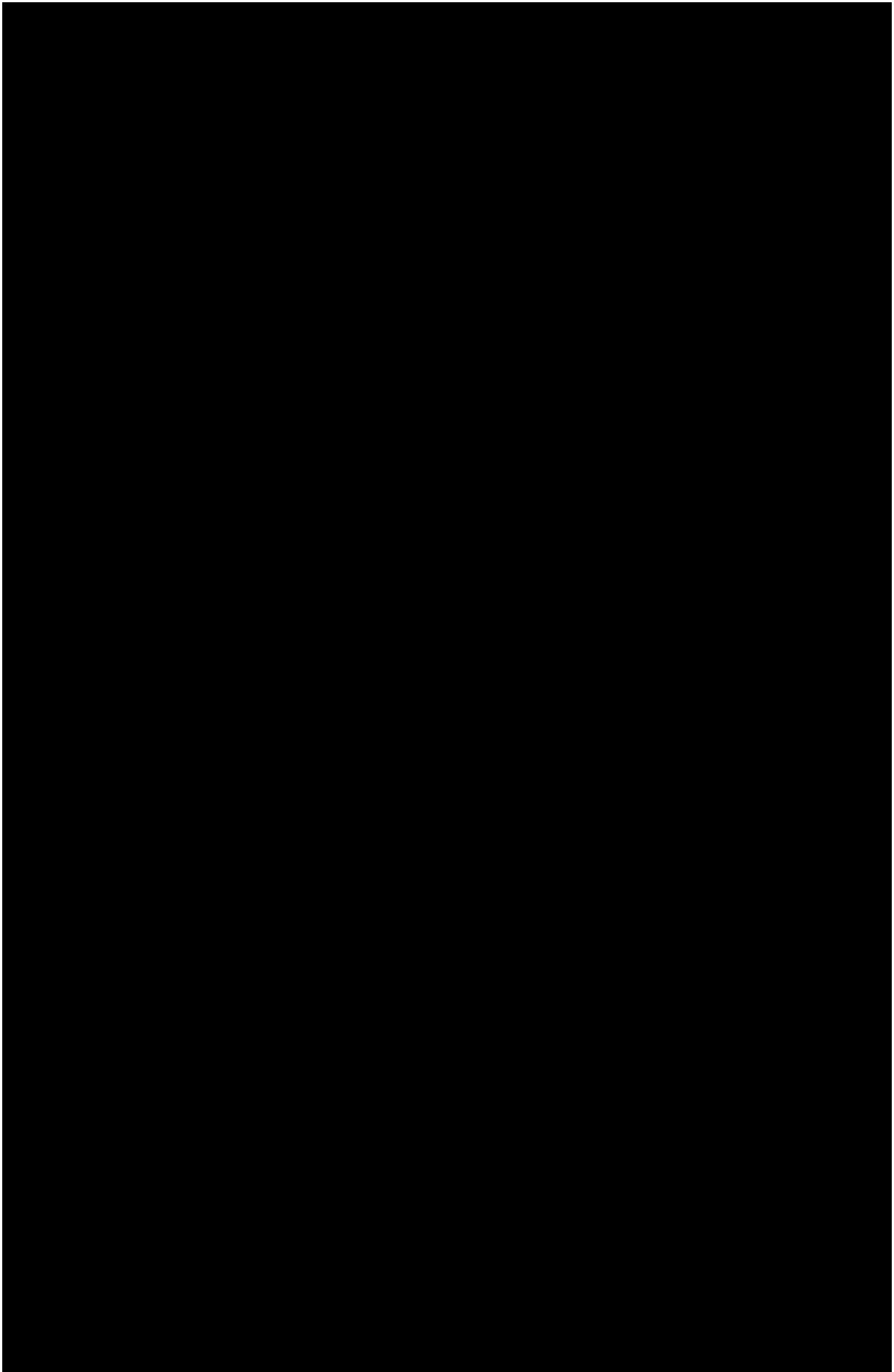
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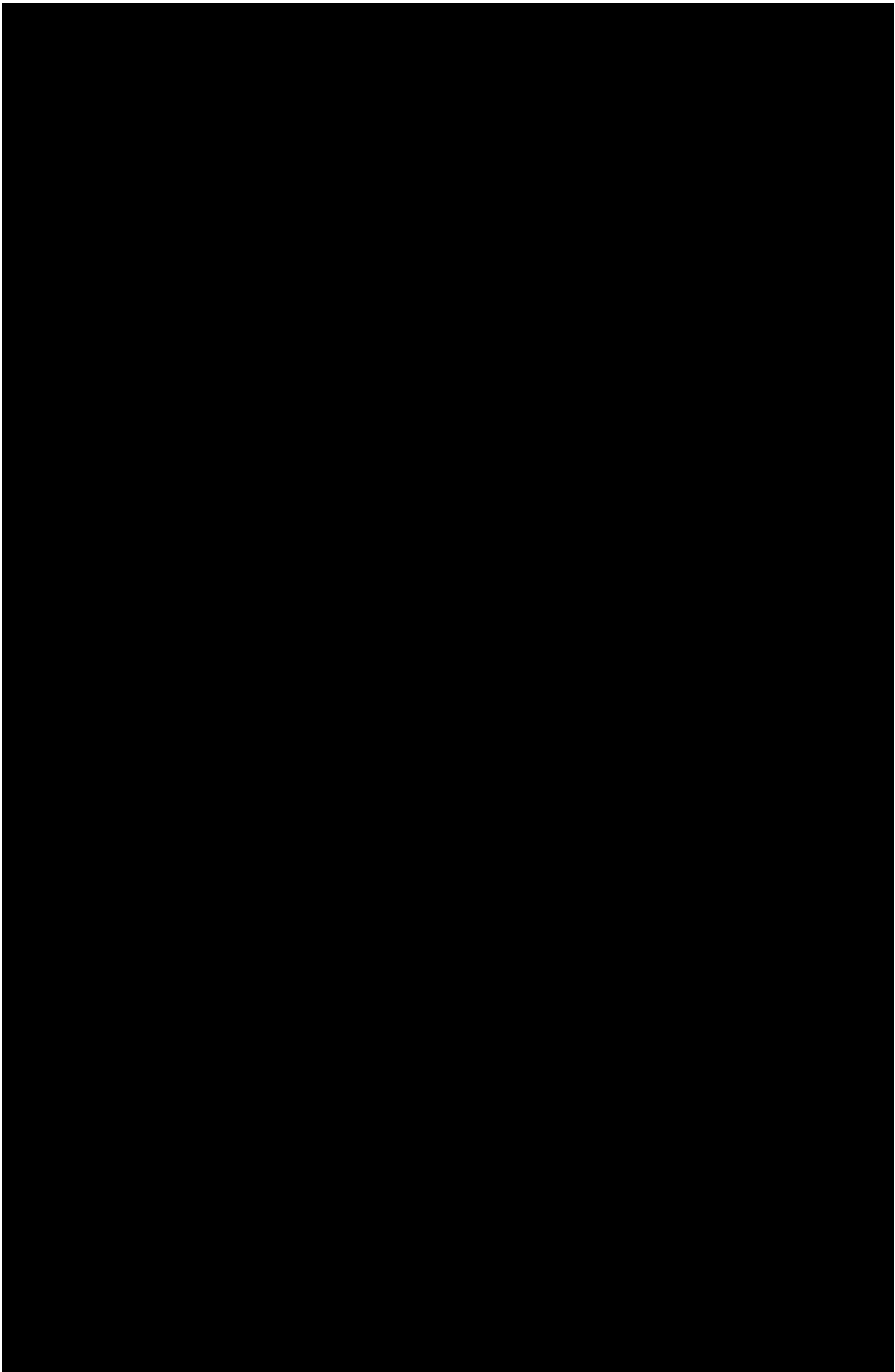
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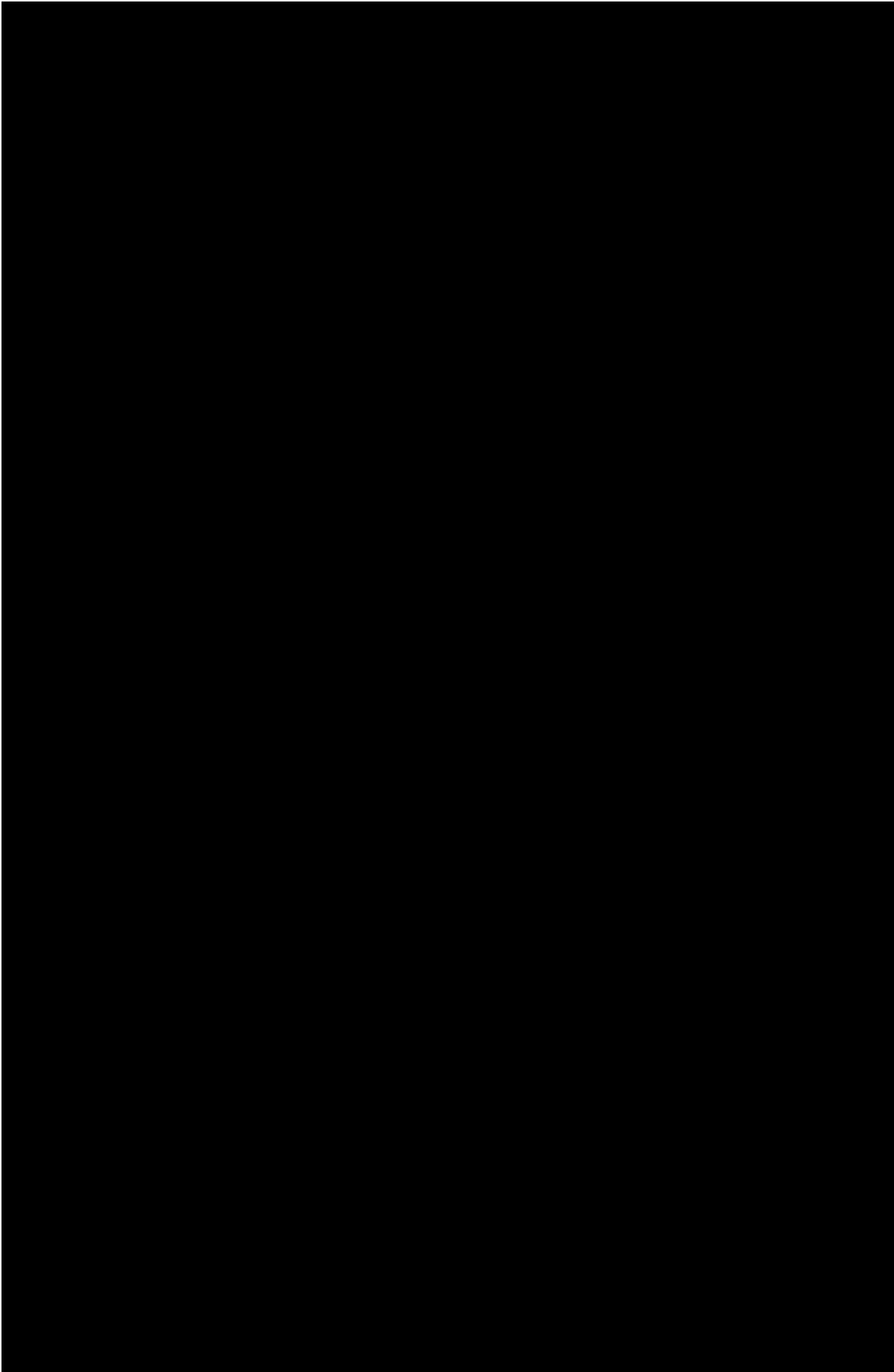
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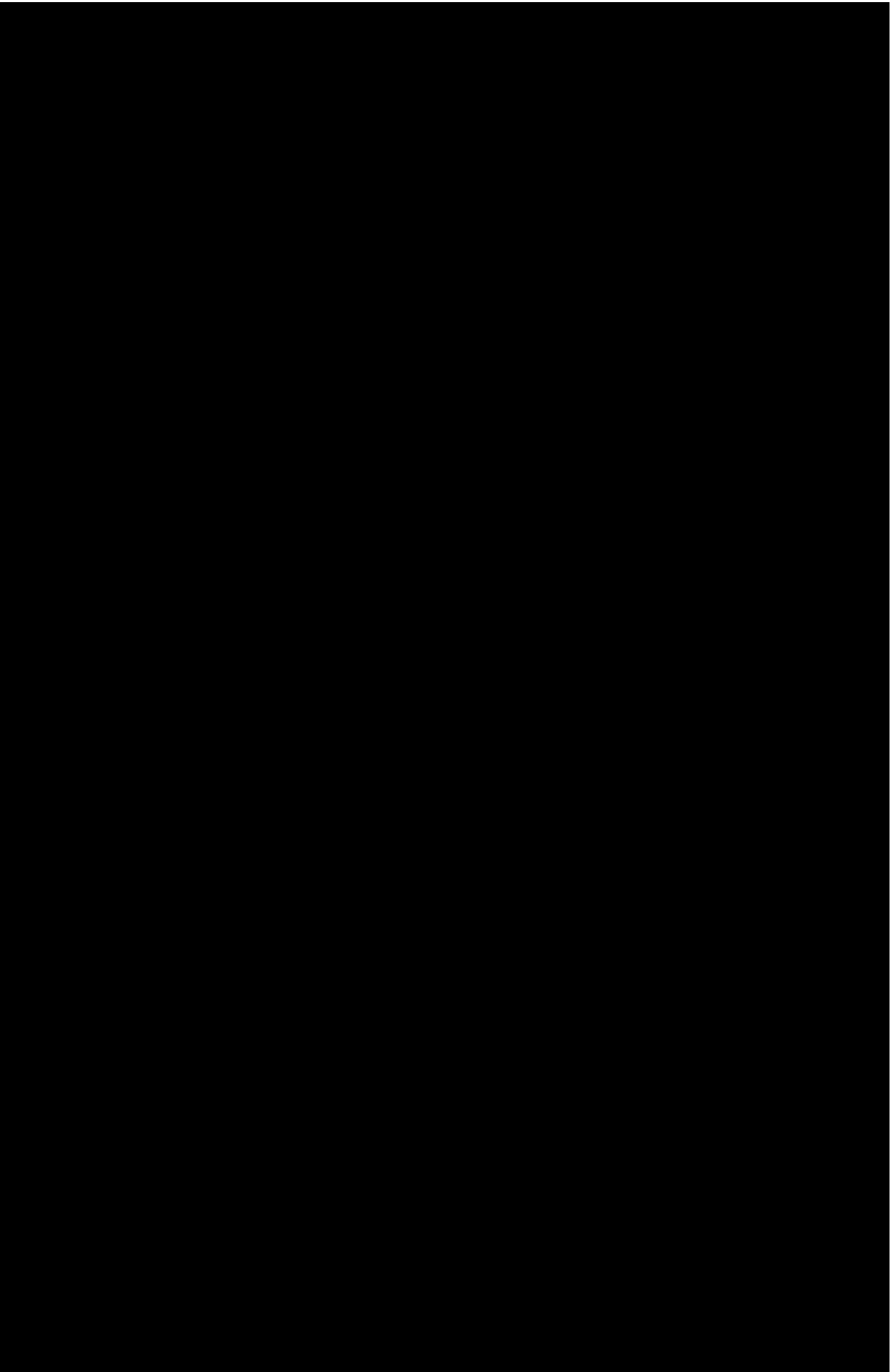
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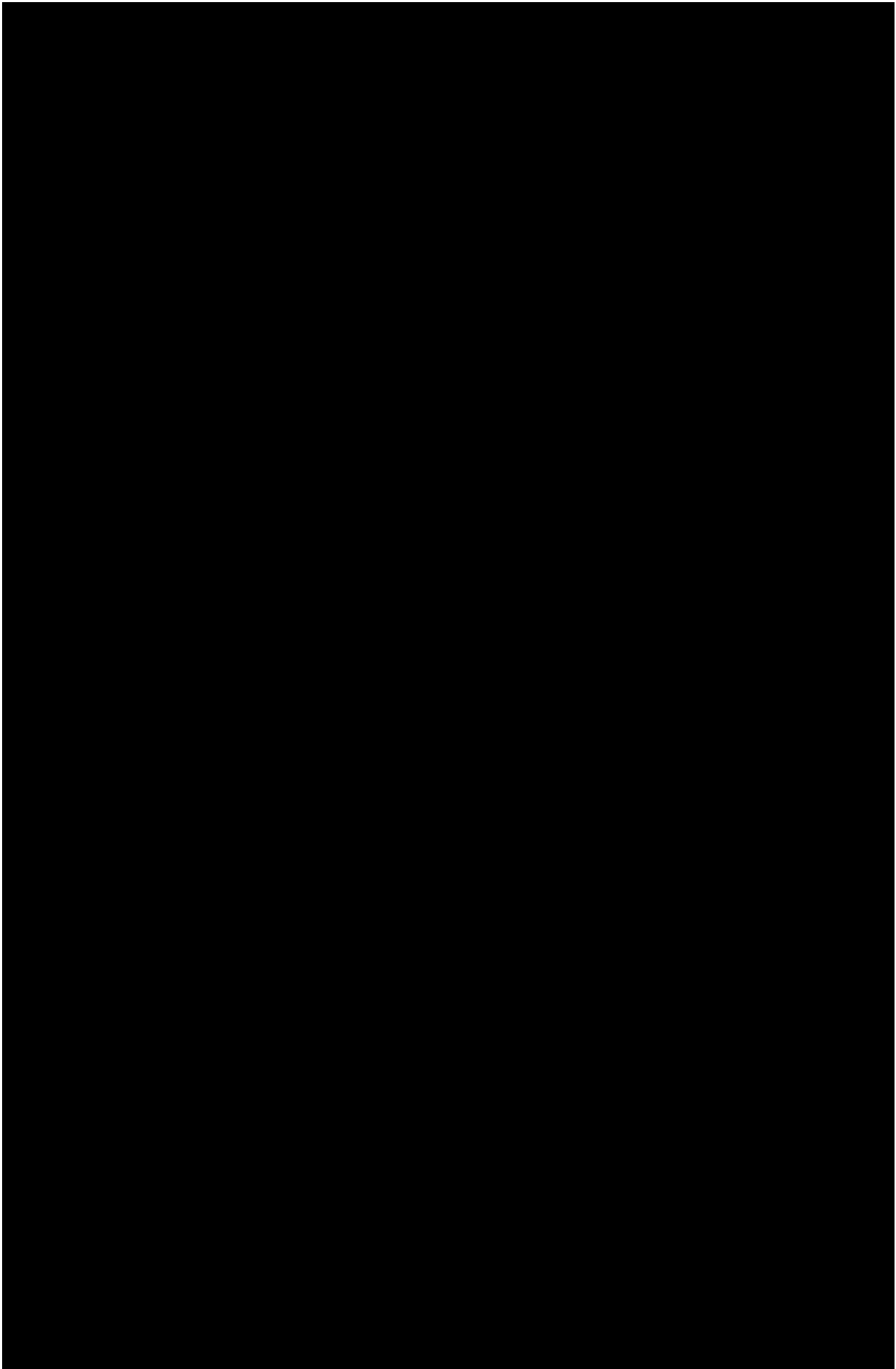
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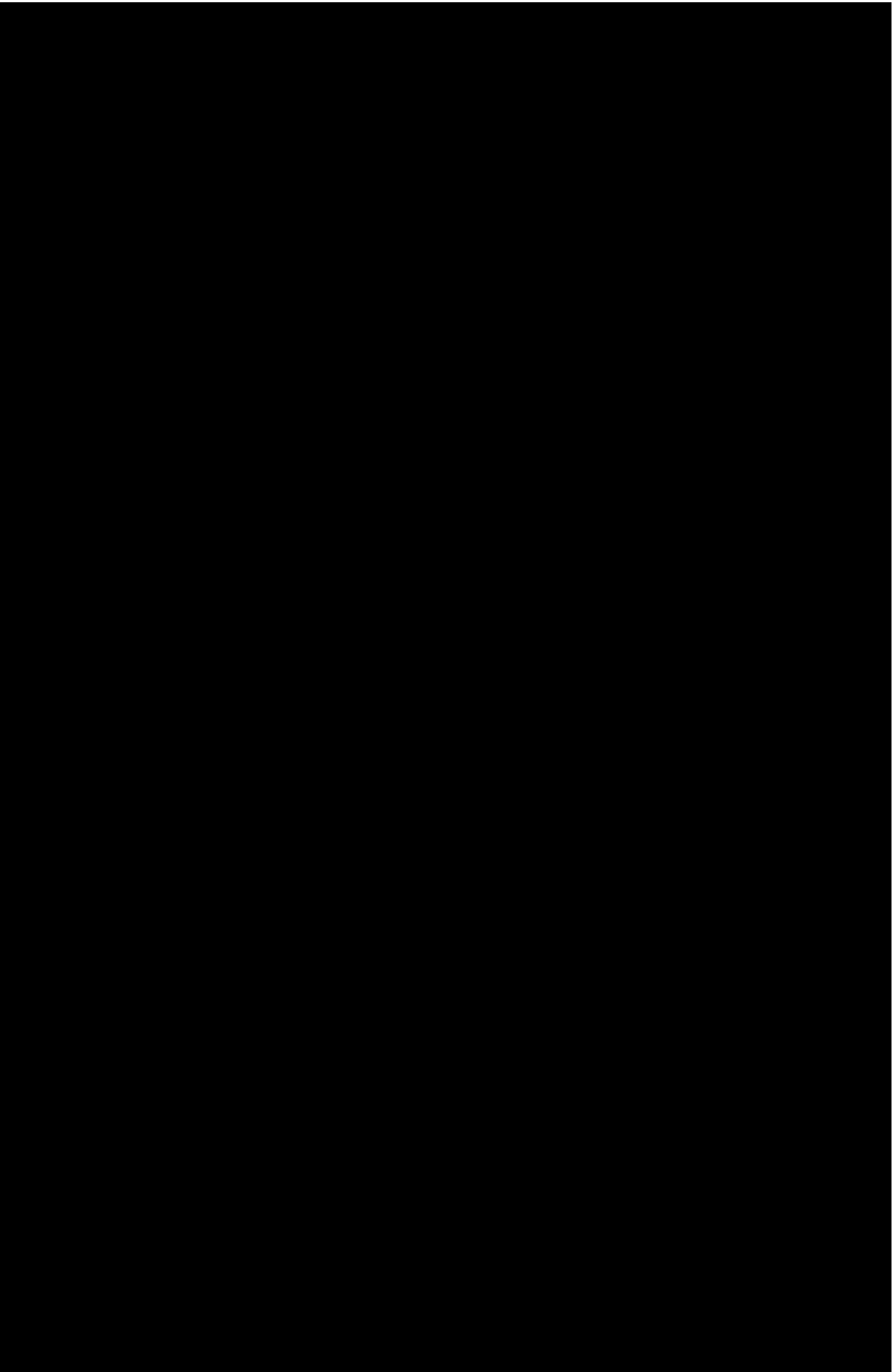
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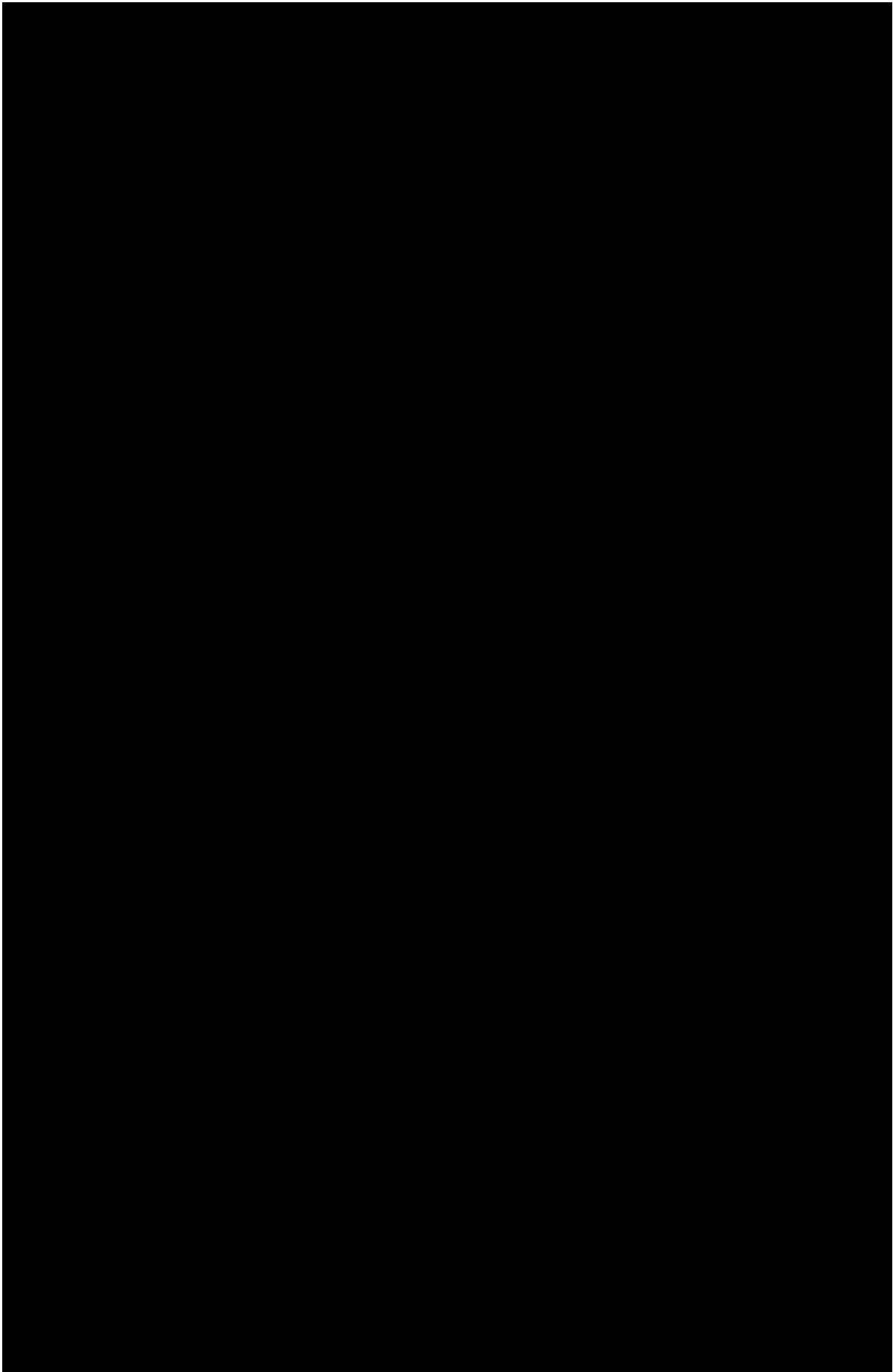
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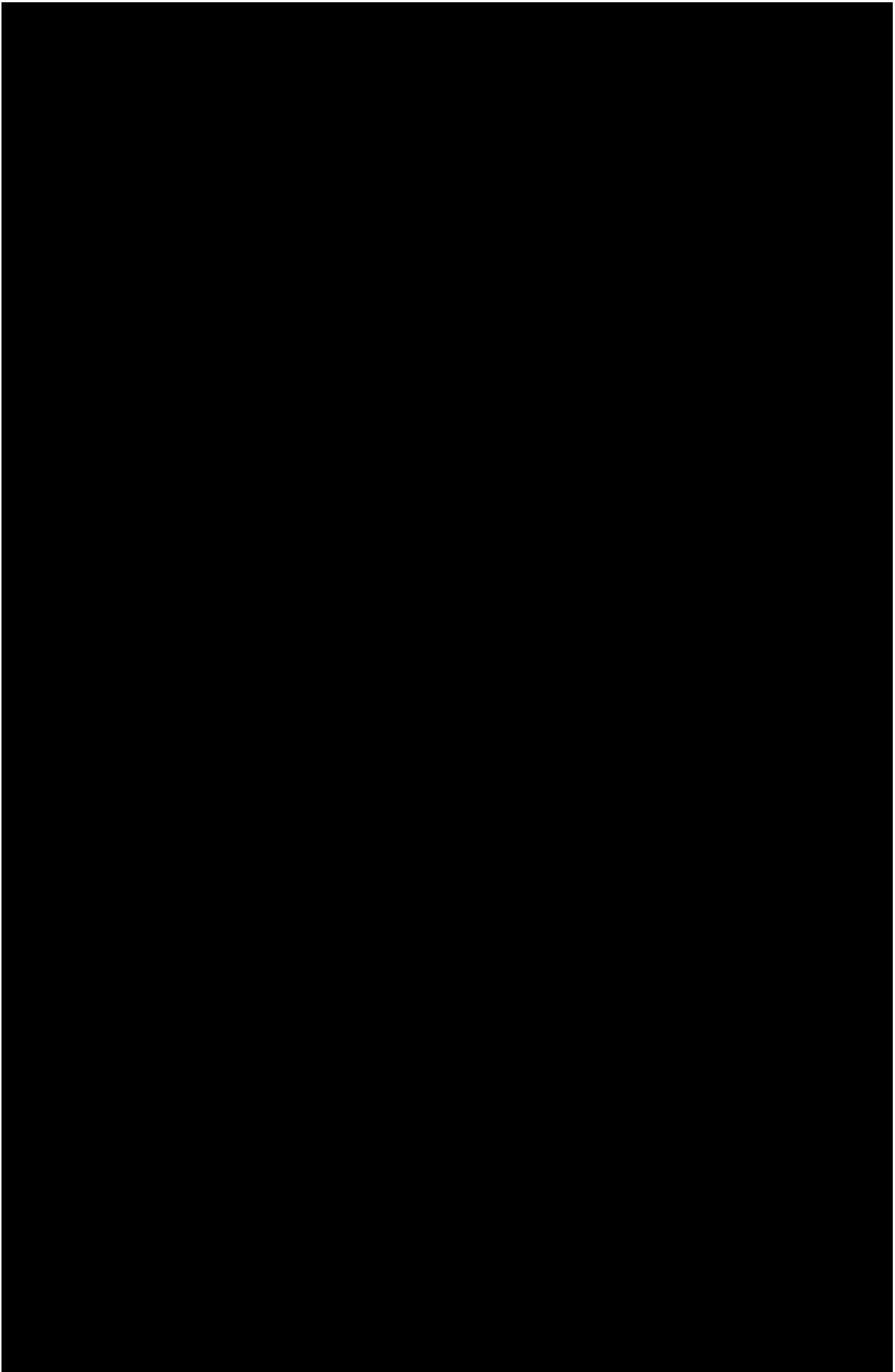
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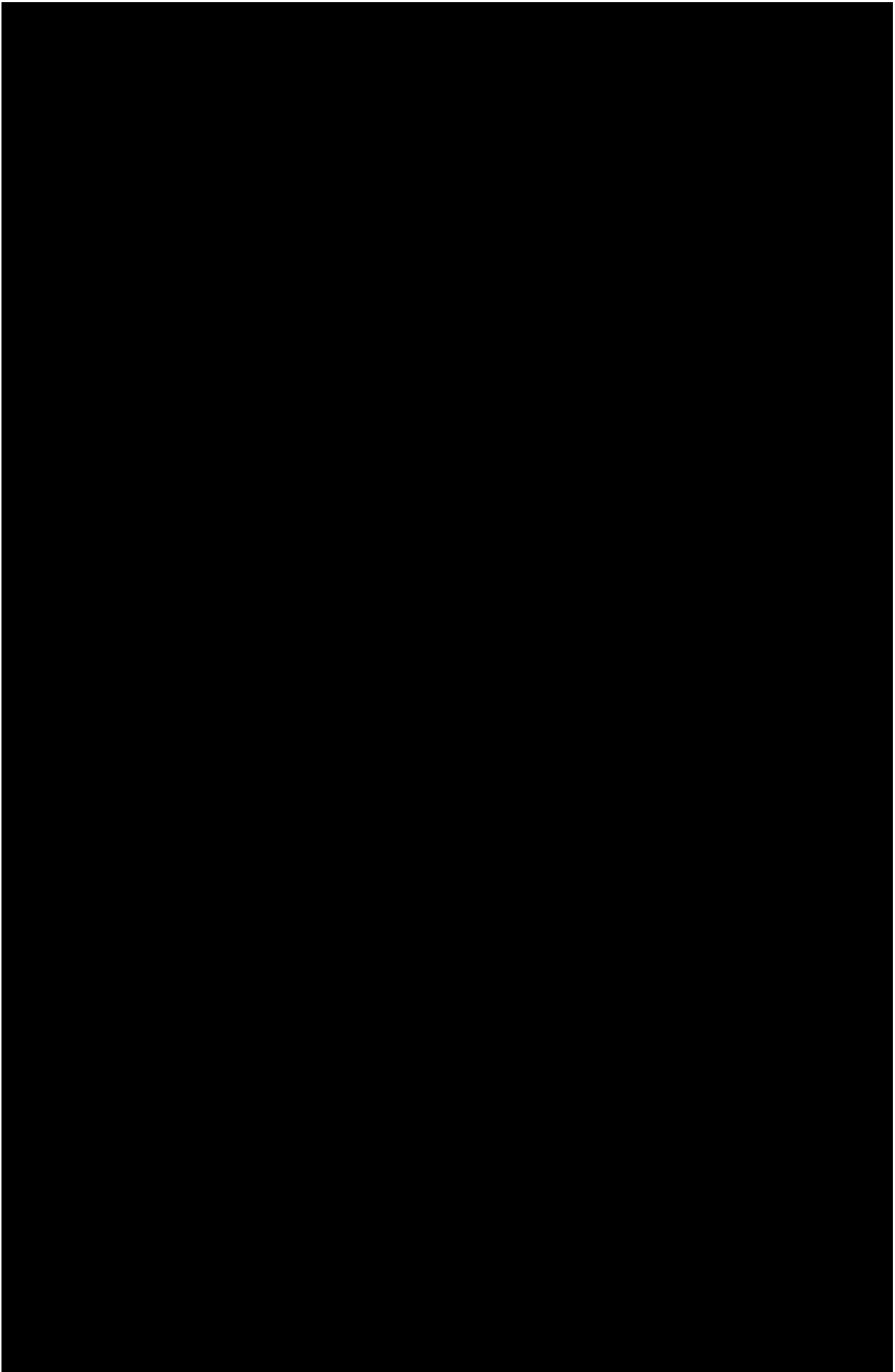
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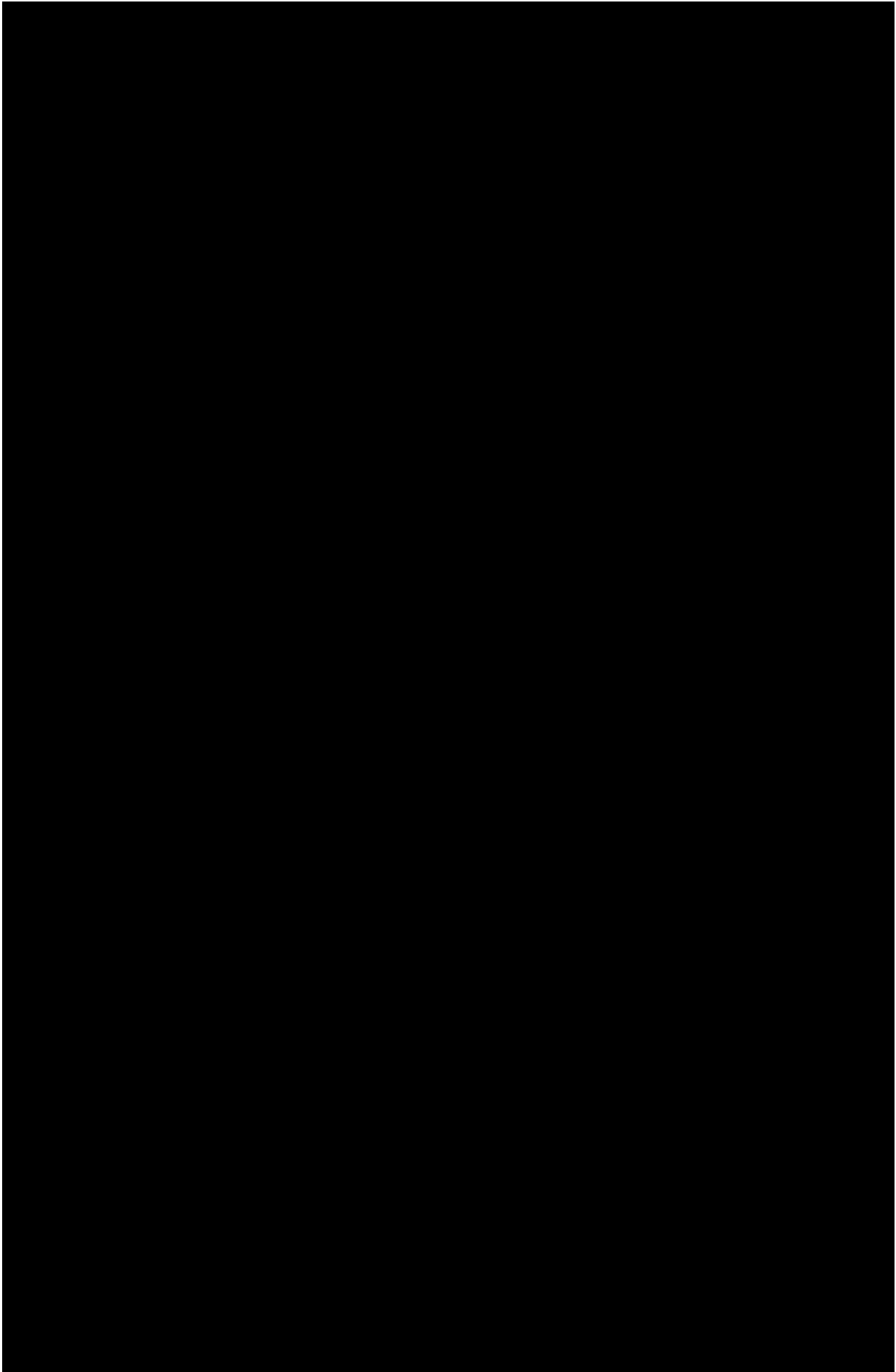
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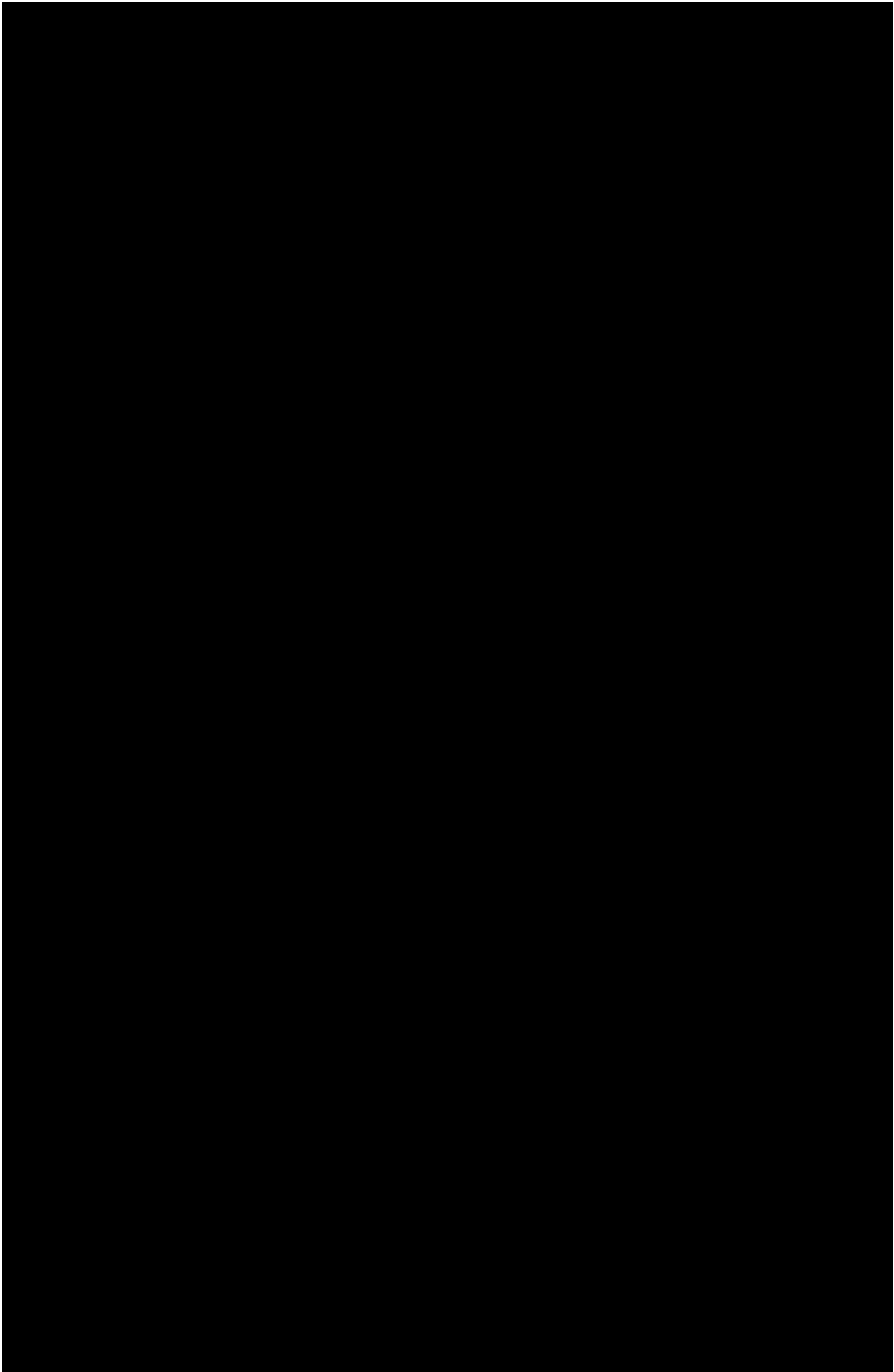
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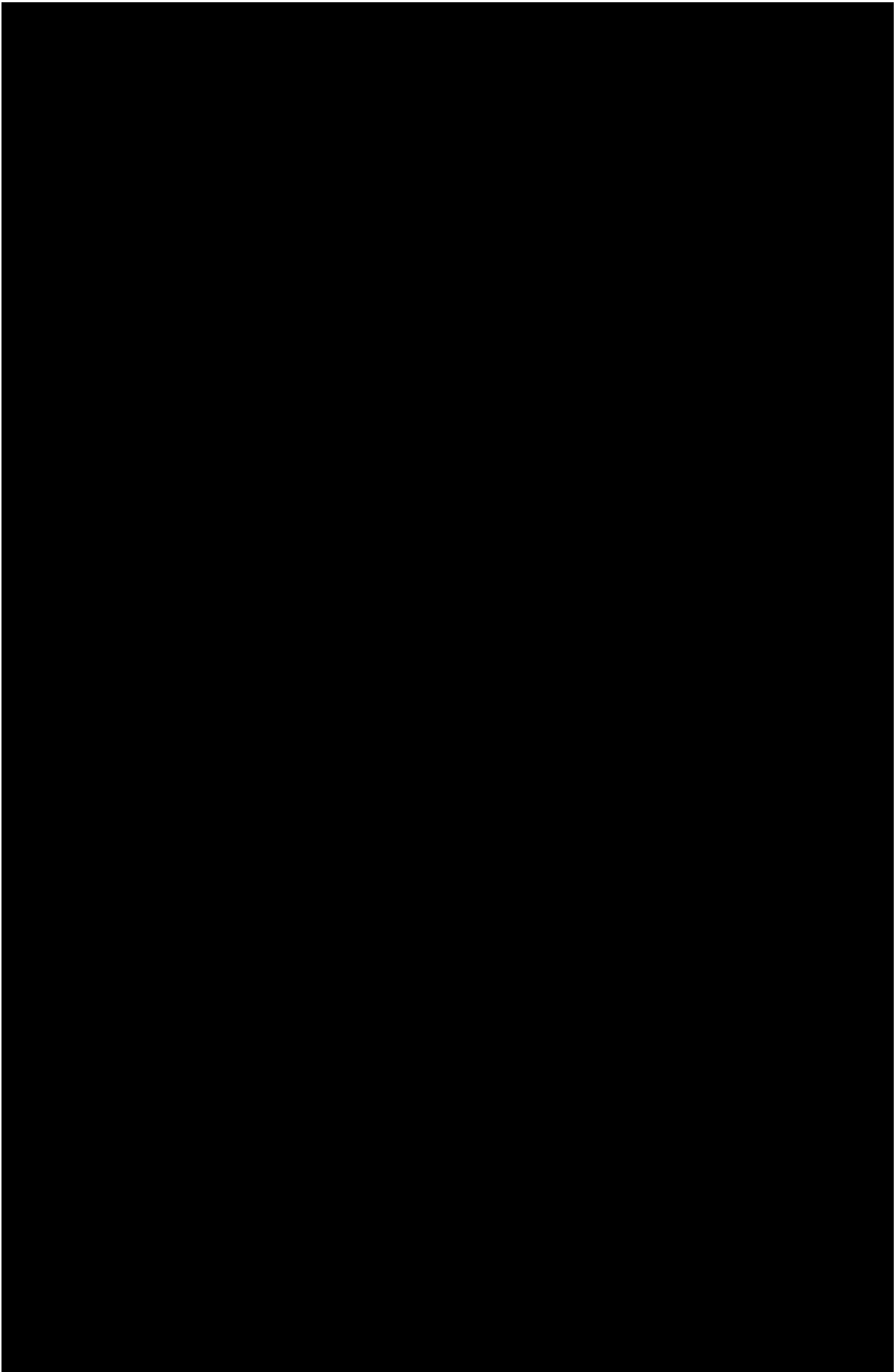
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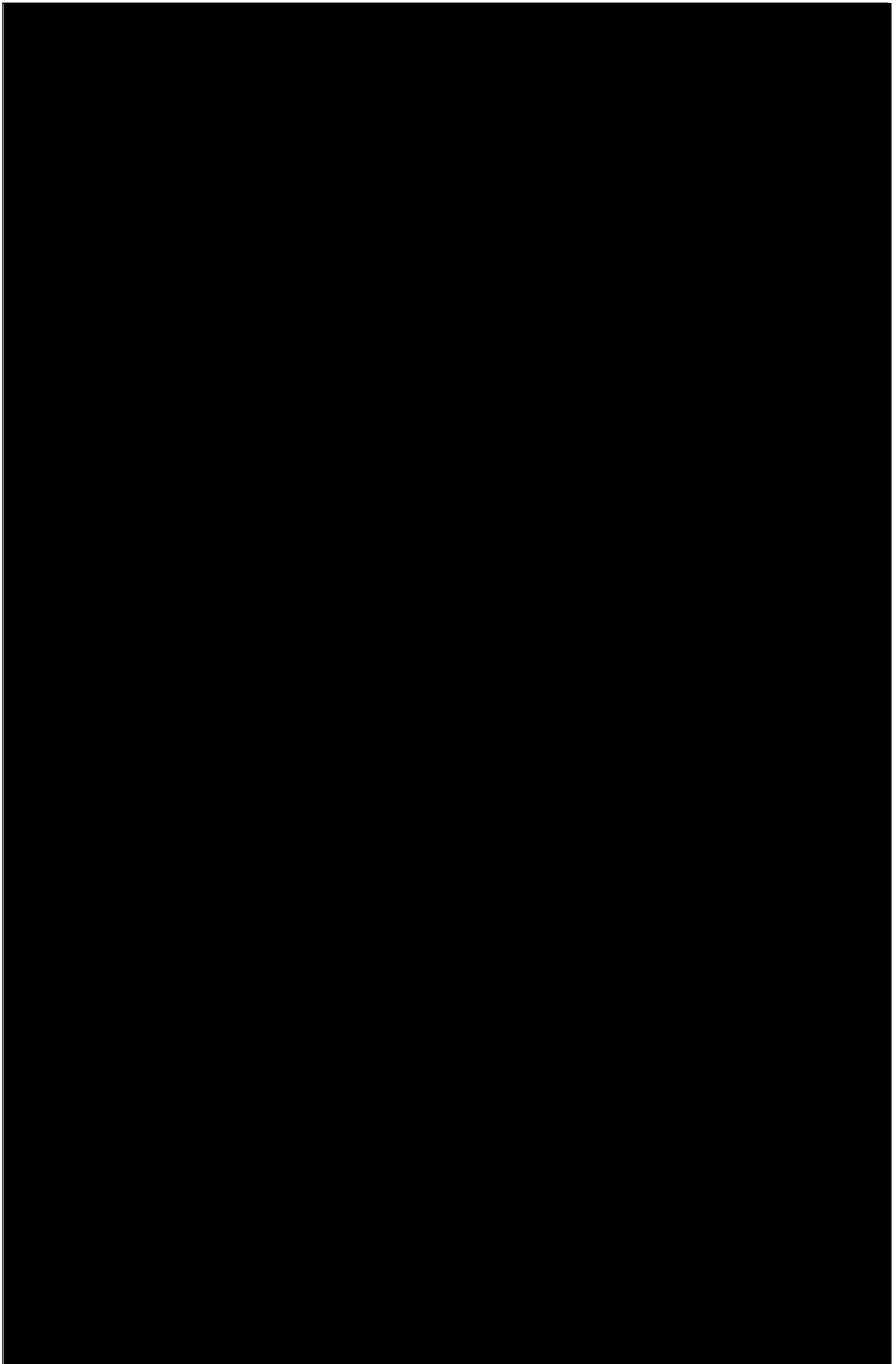
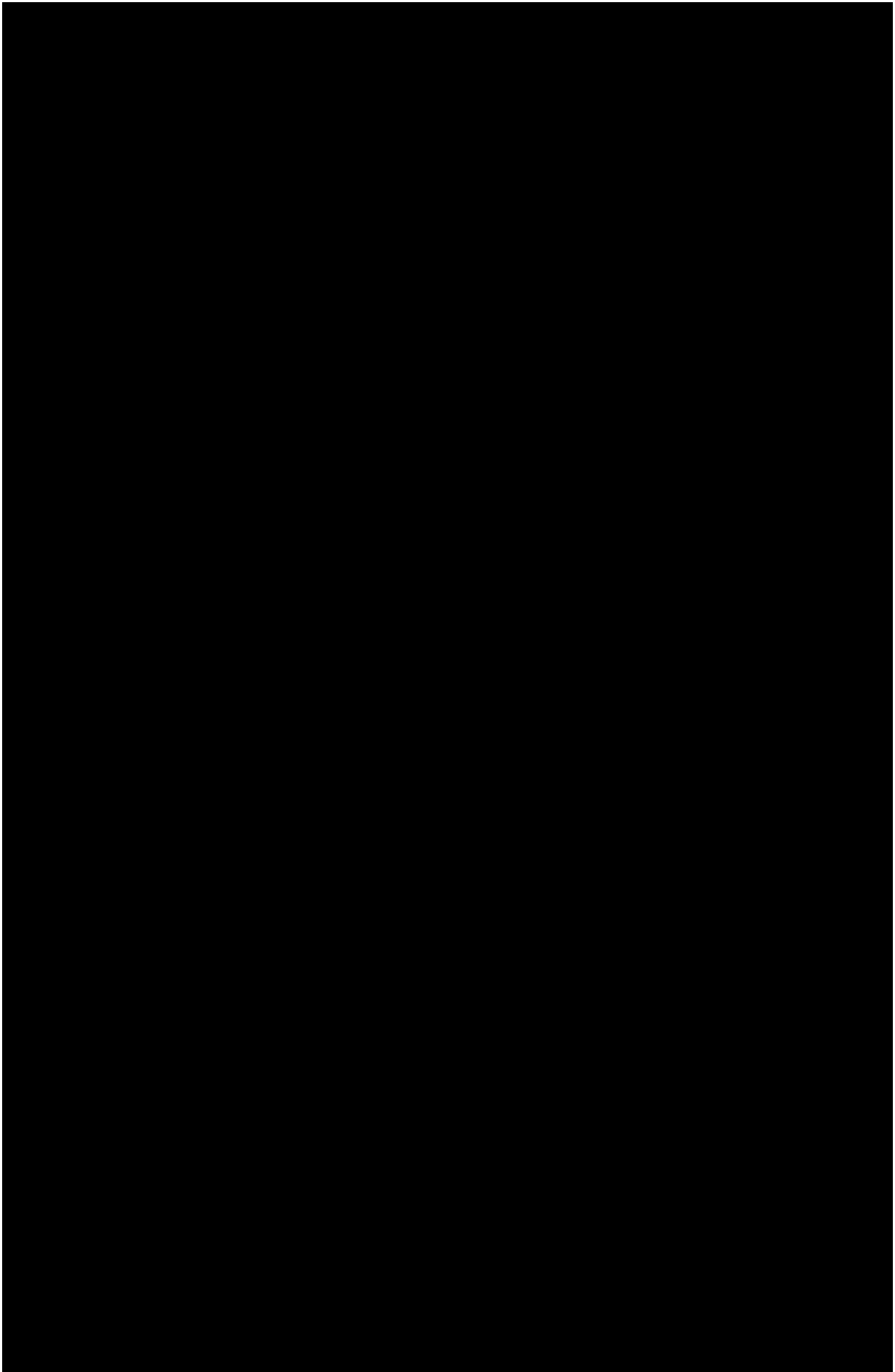
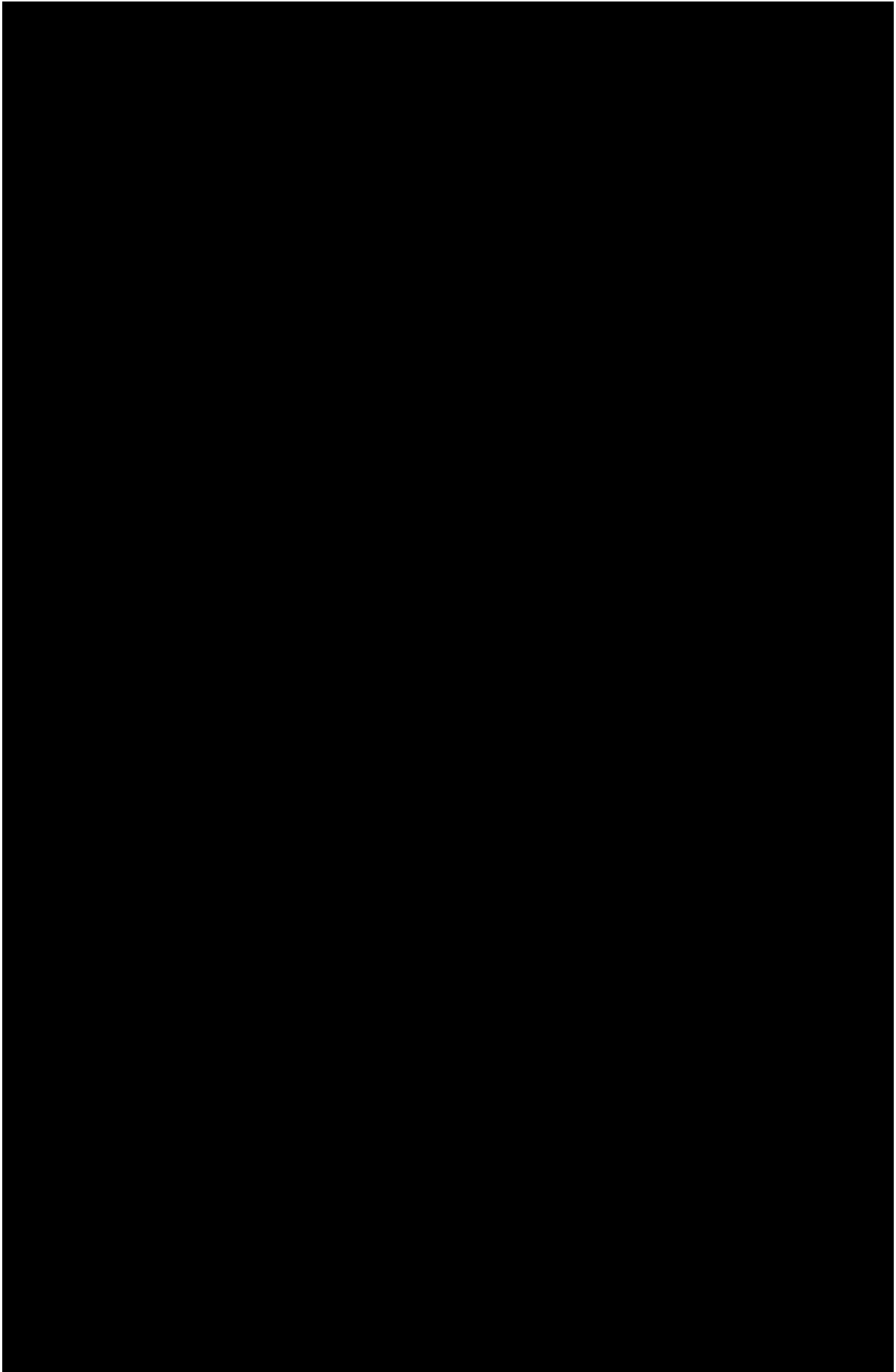


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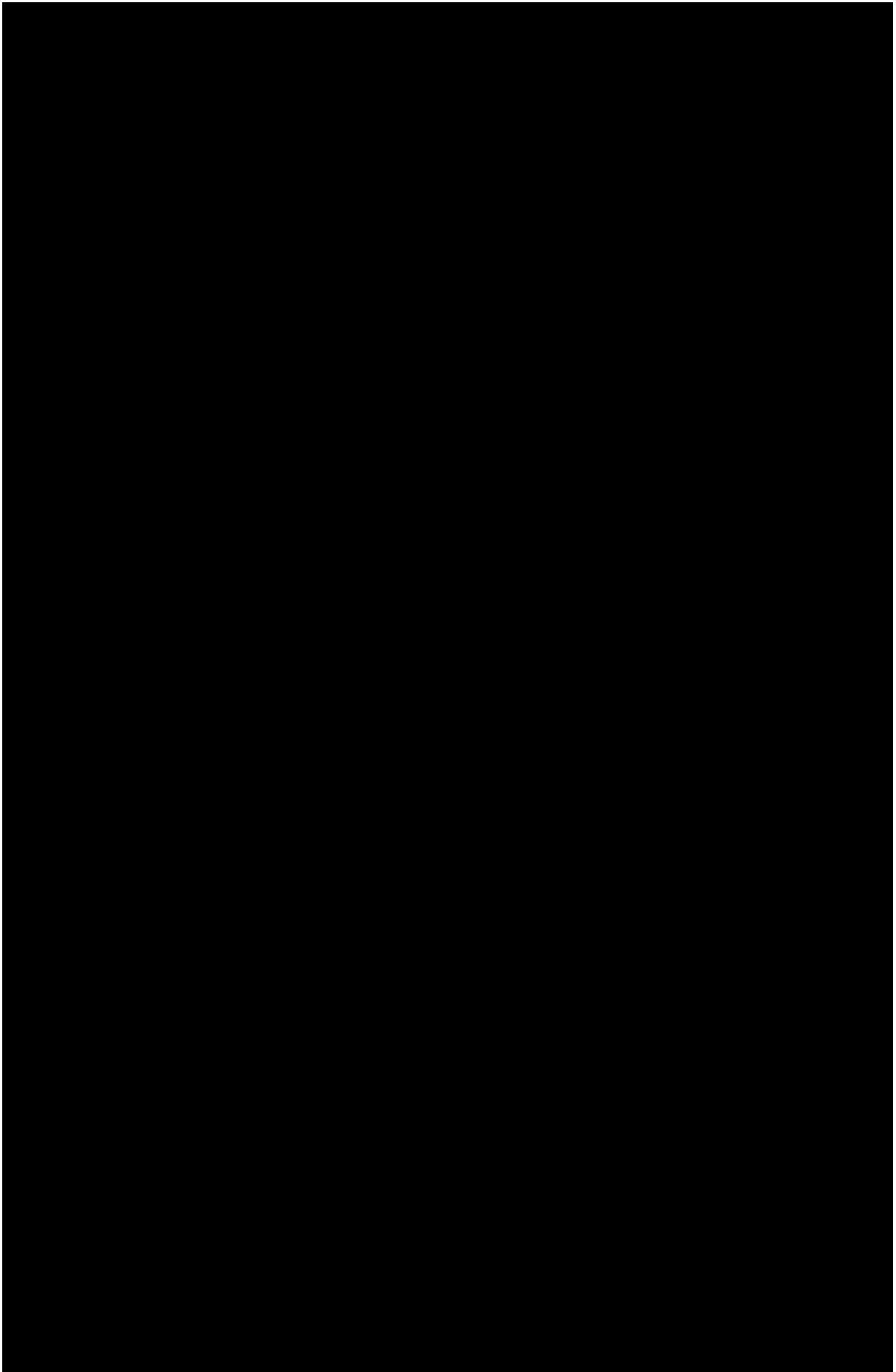
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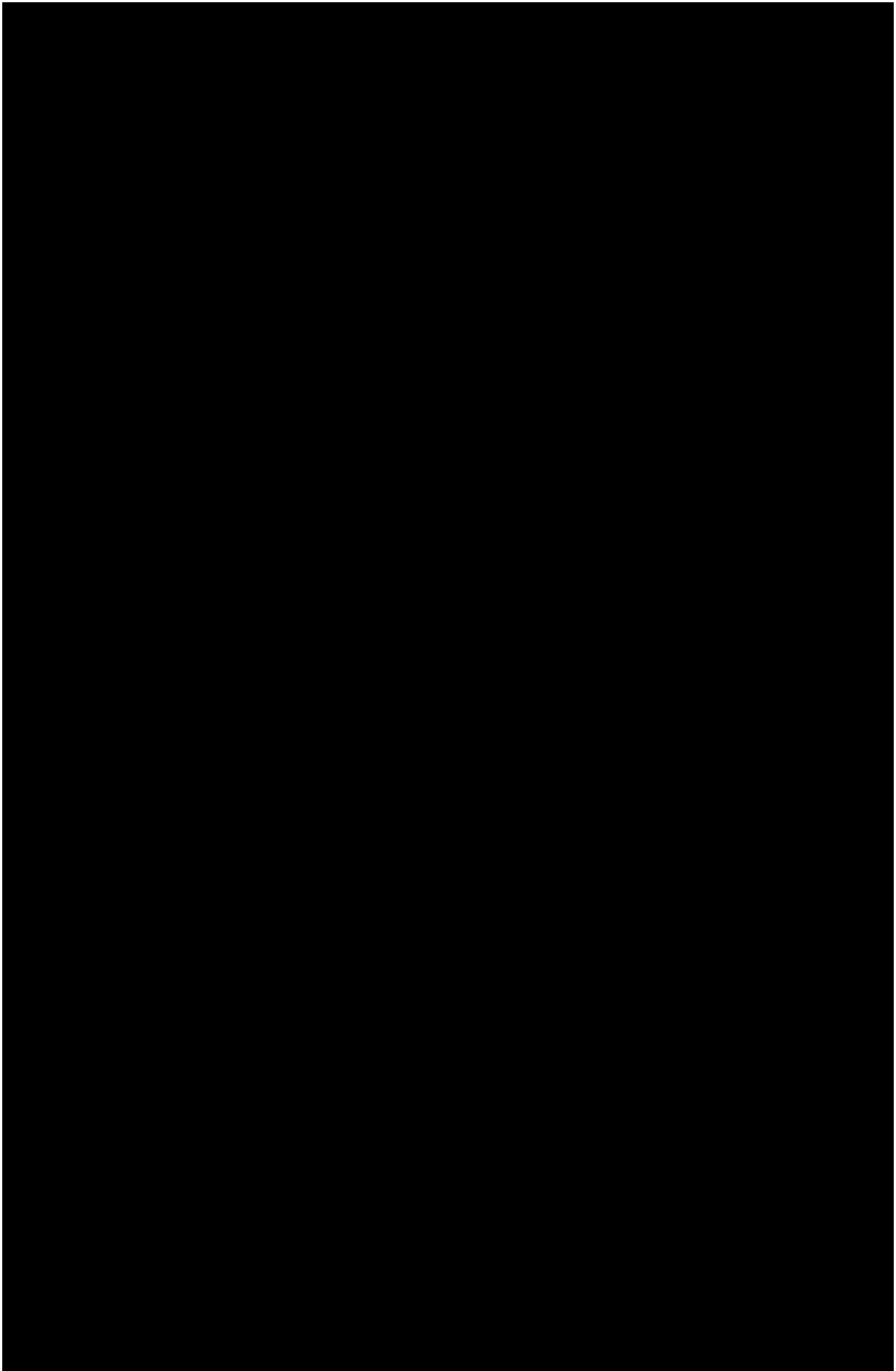
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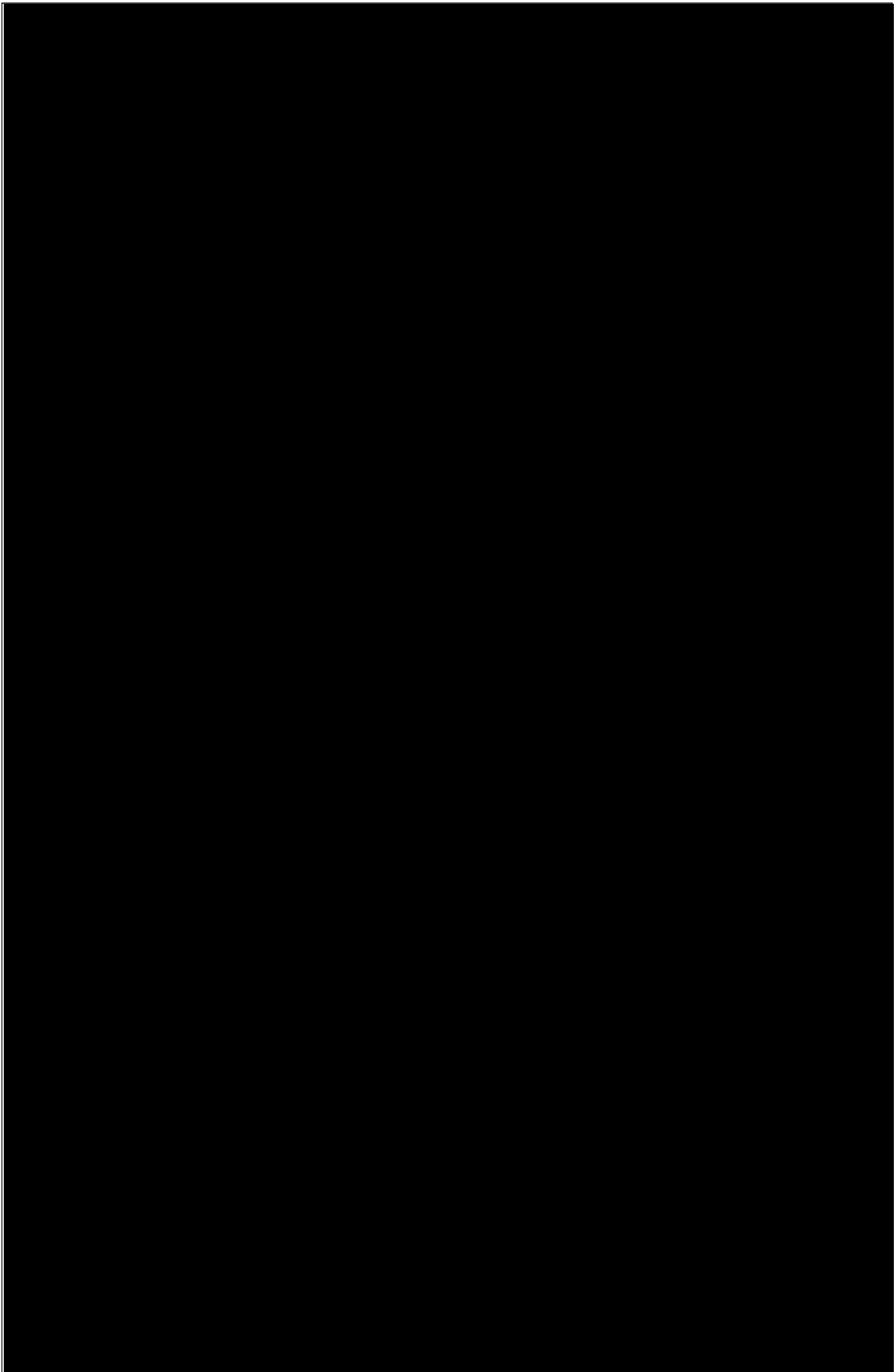
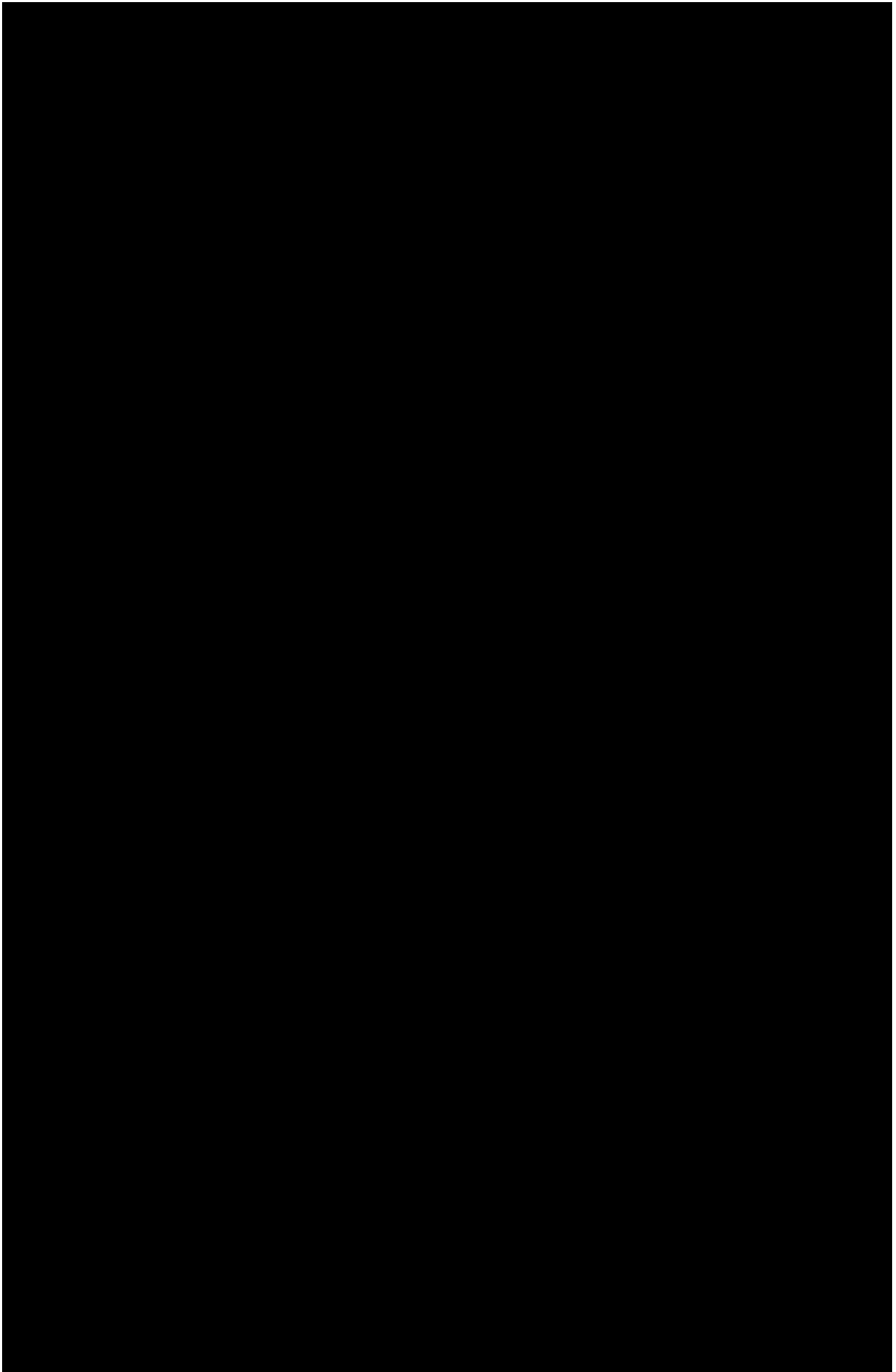
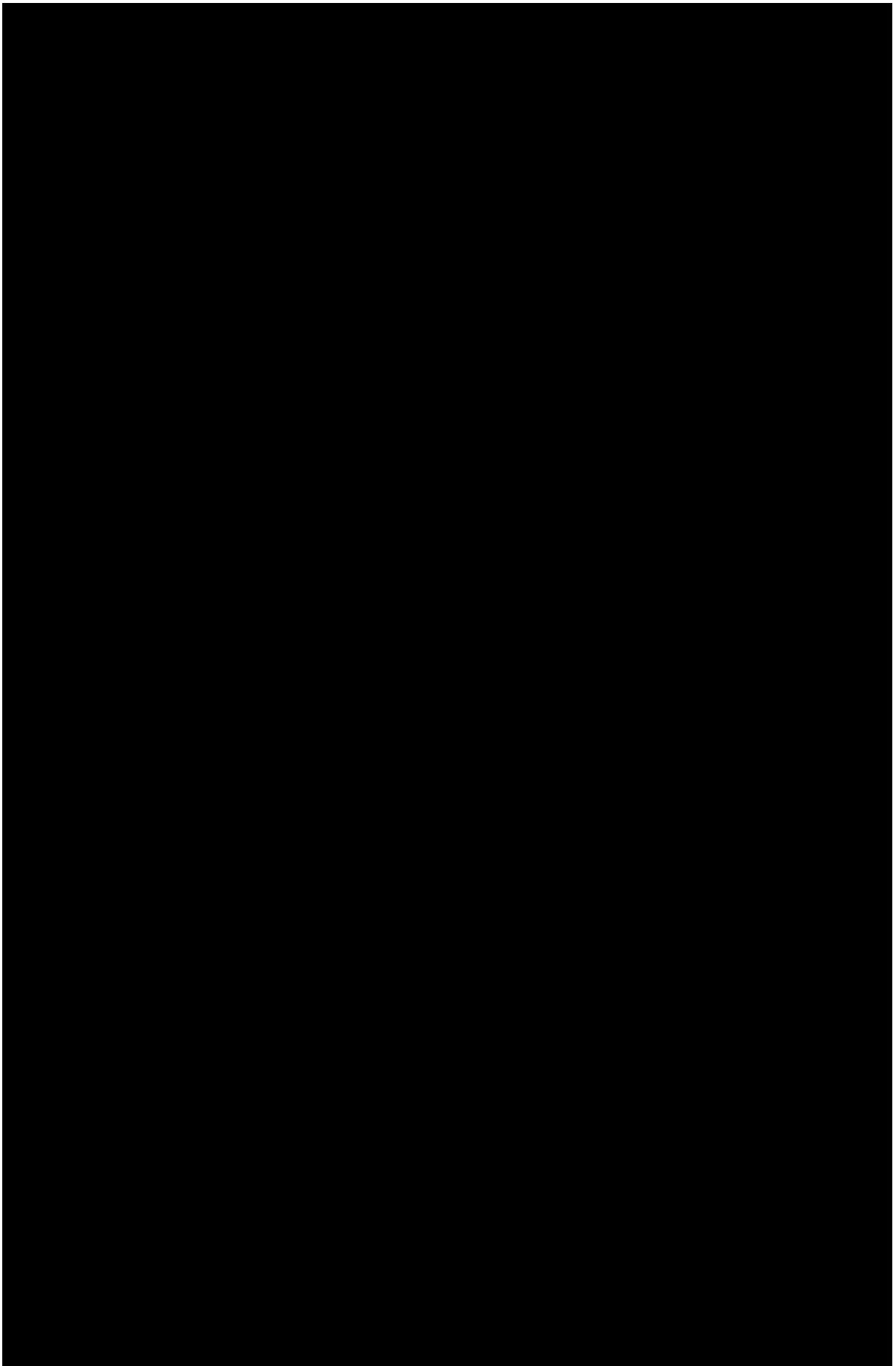


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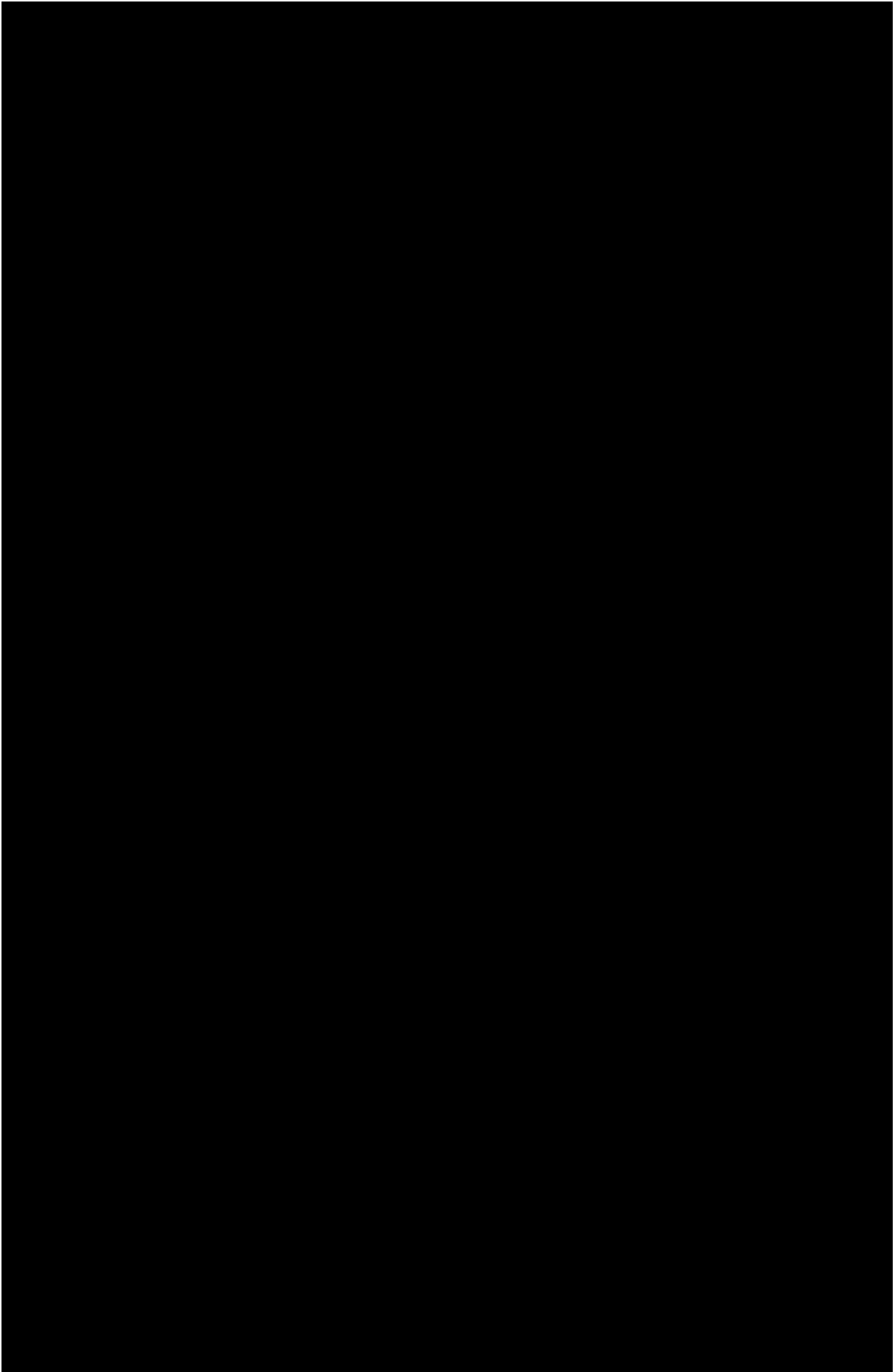
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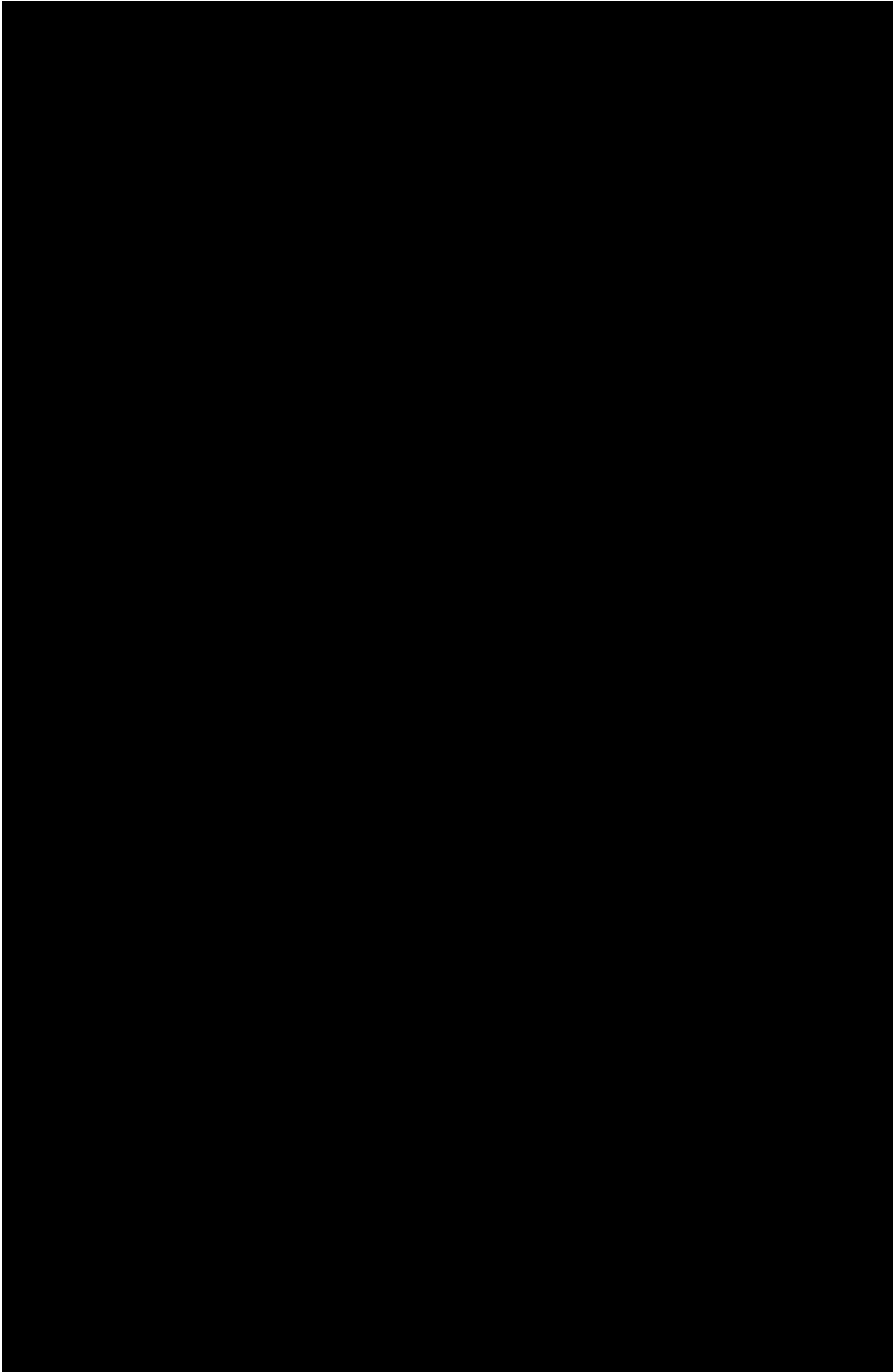
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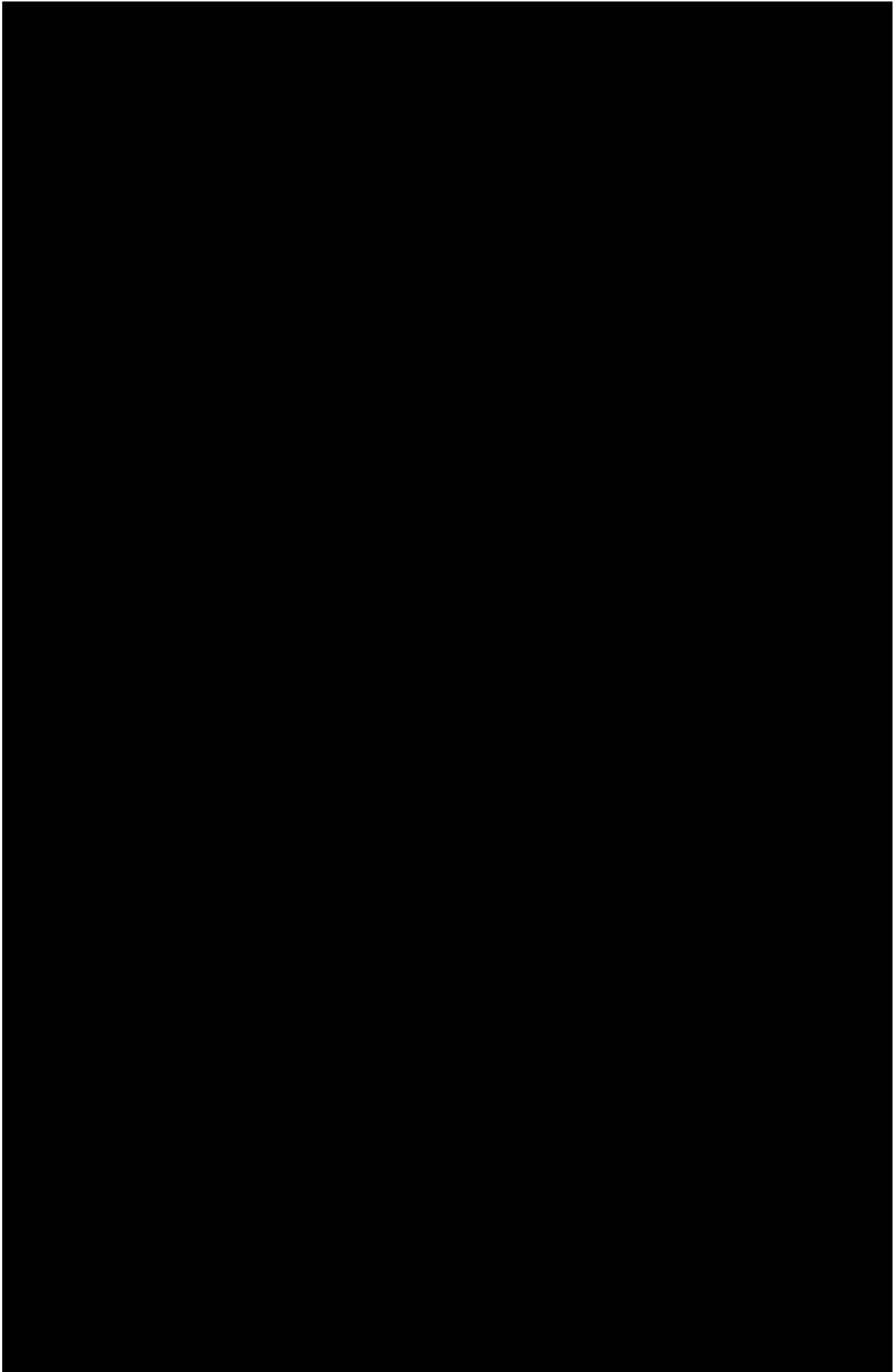
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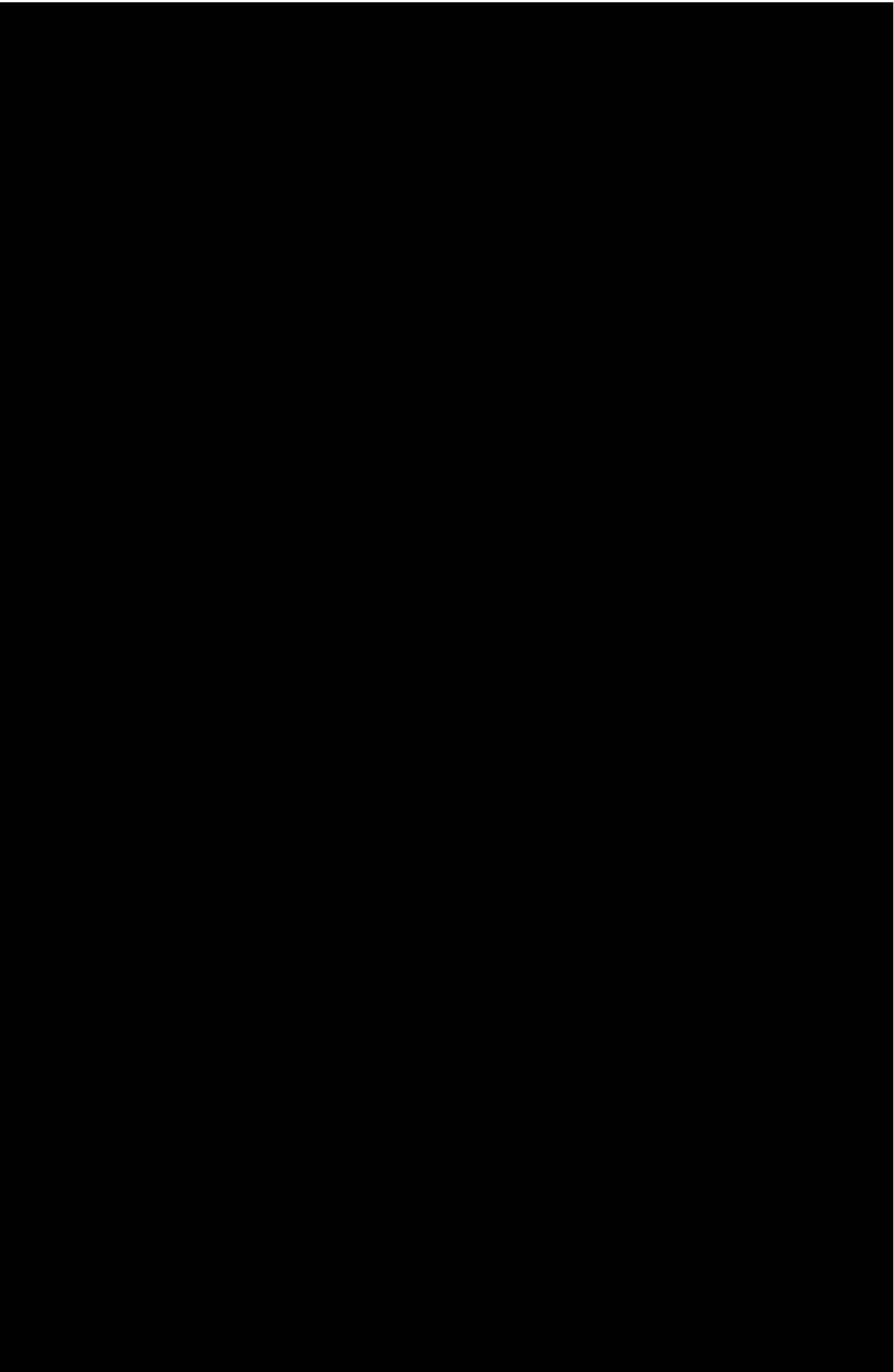
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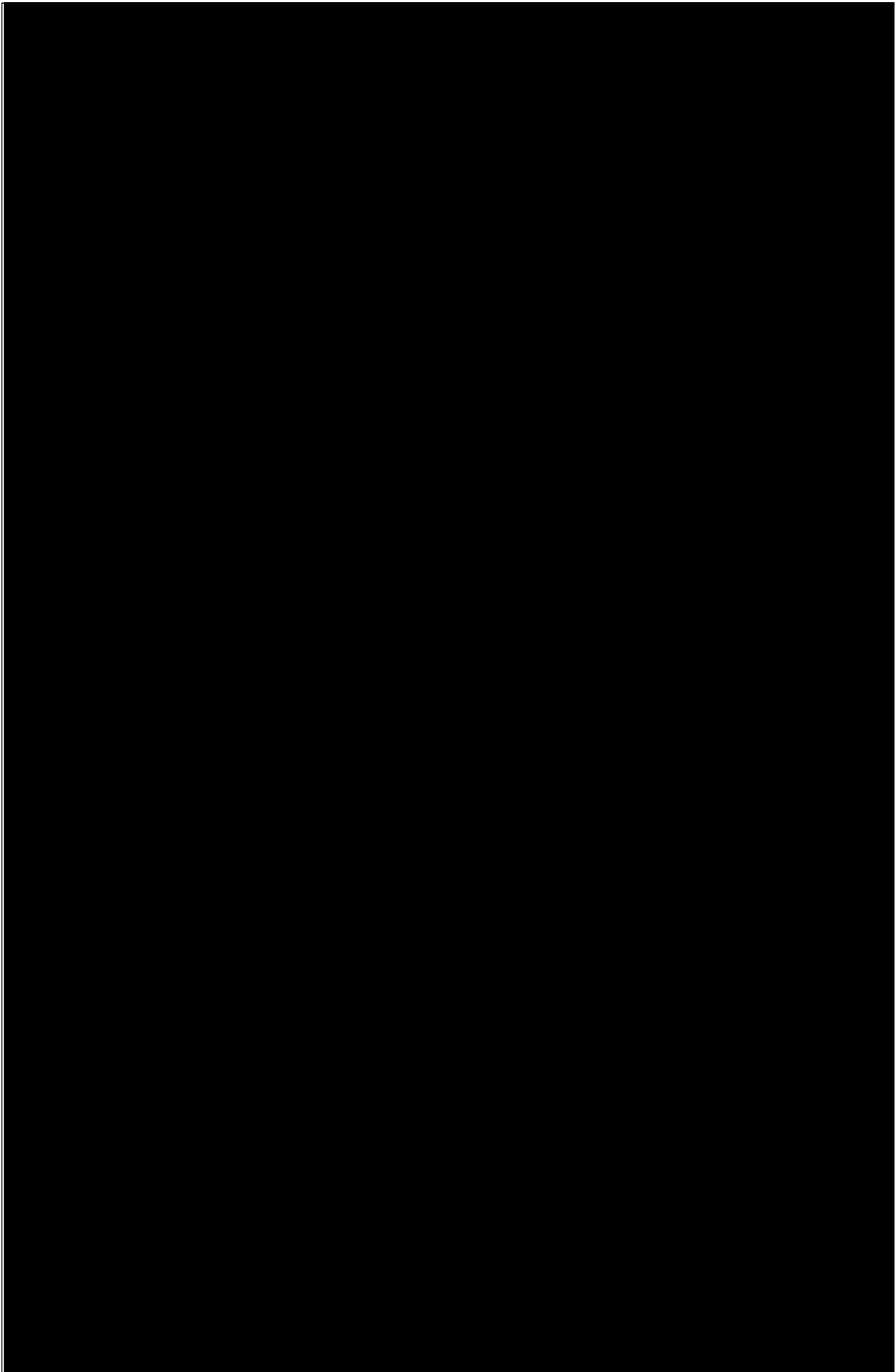
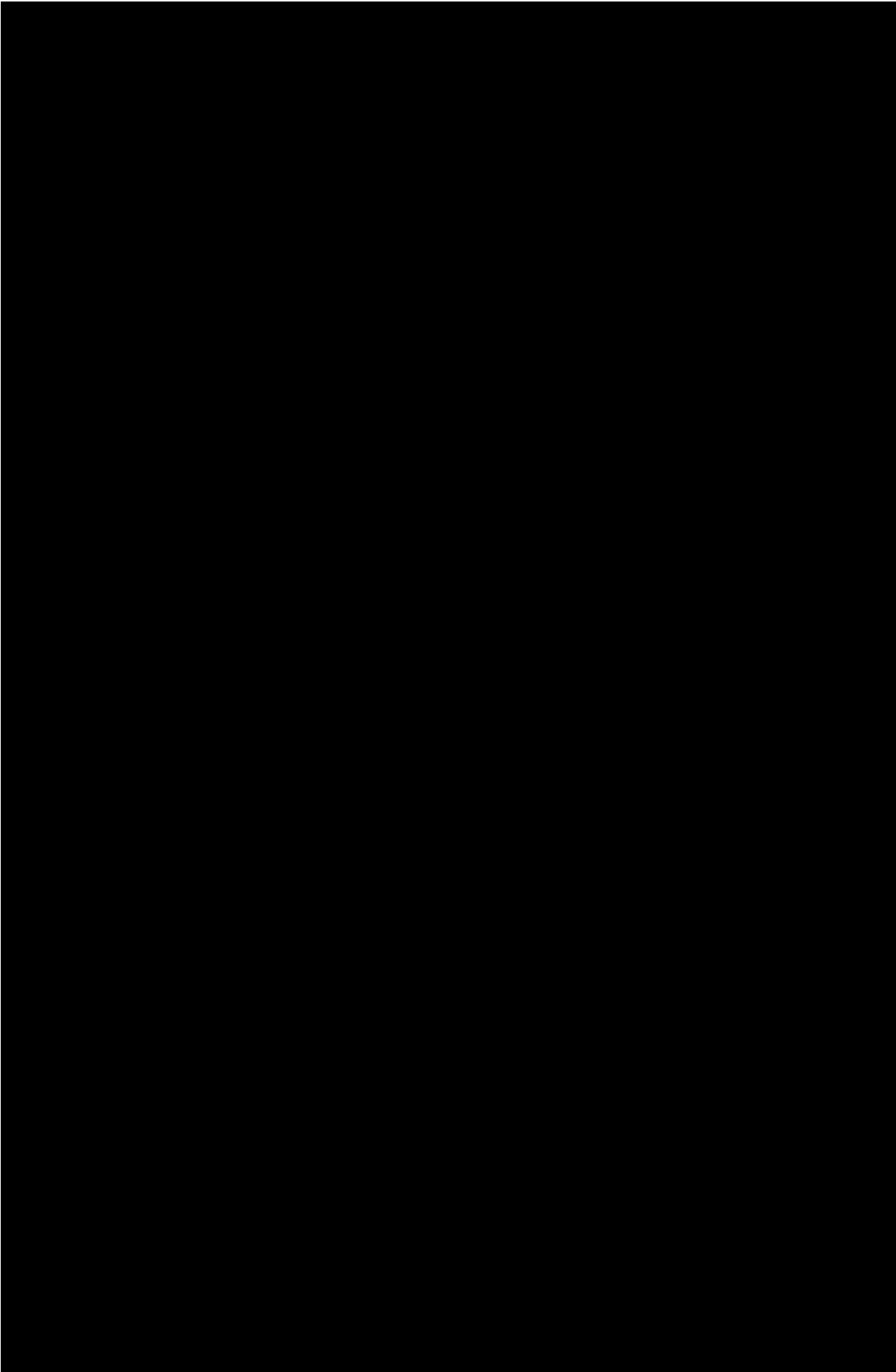
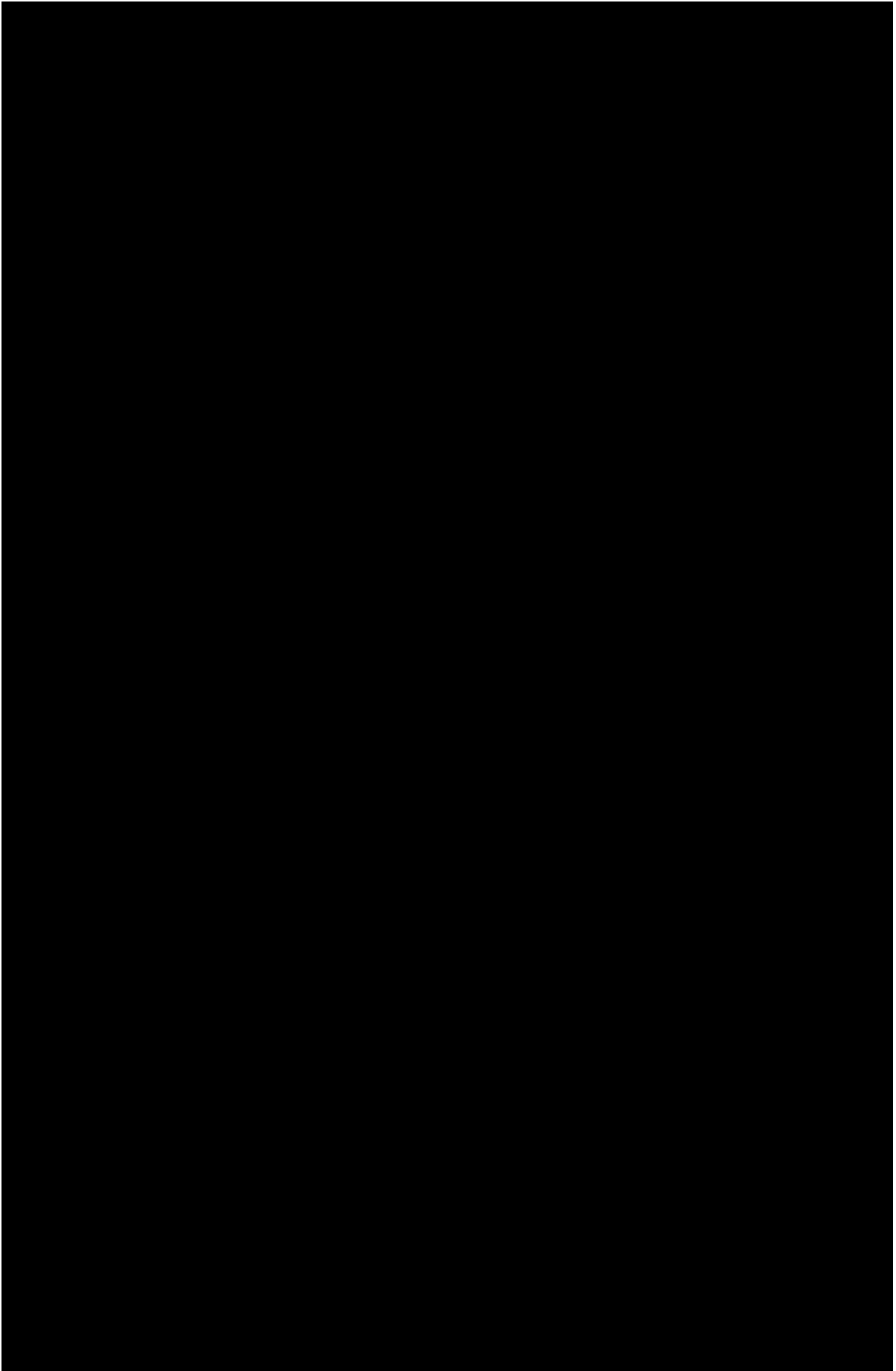


Exhibit 3

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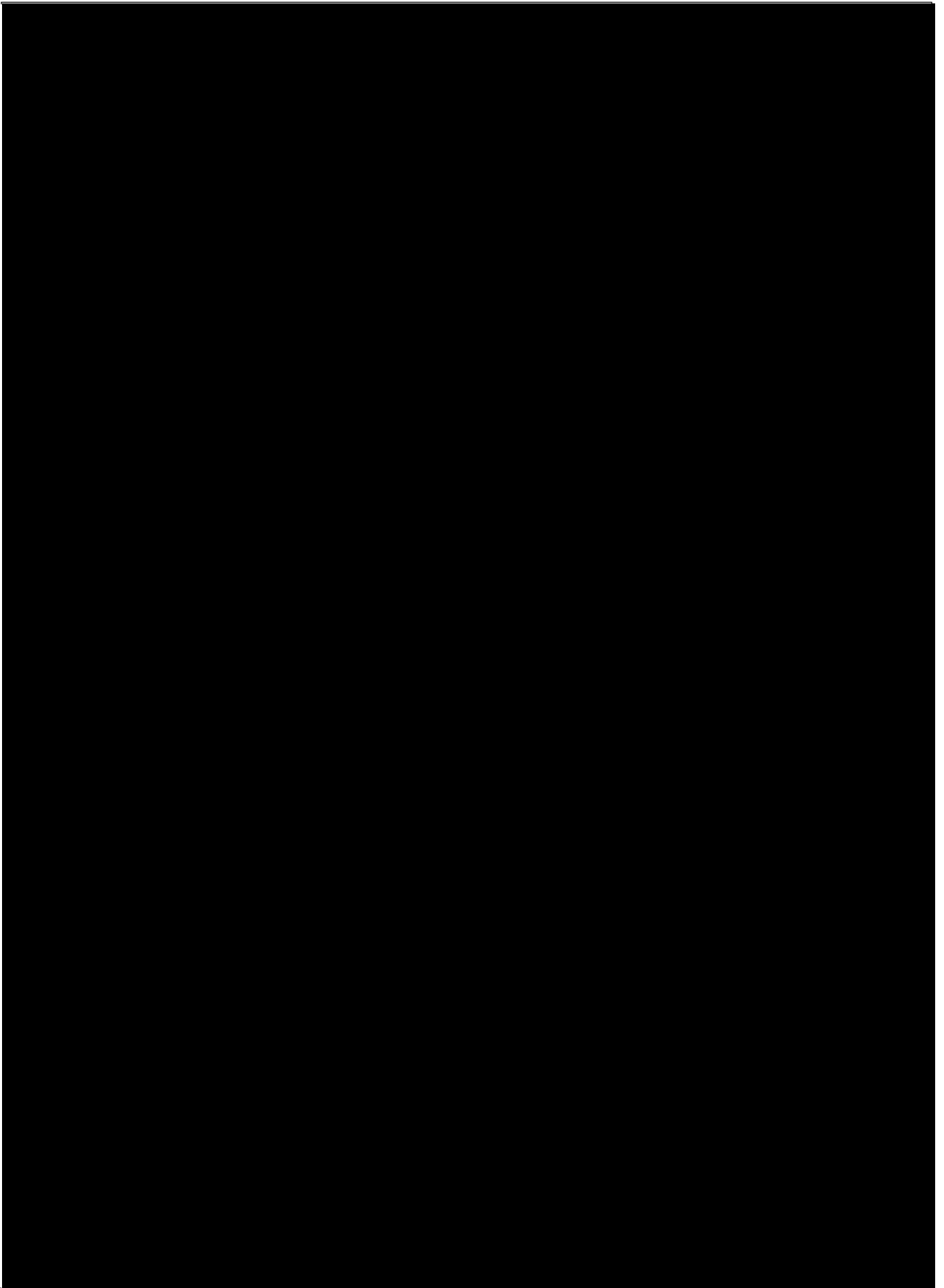


Exhibit 3

